

EXHIBIT Q

Deposition of Wanda Andrews

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18 FED. R. CIV. P.30(B)(6) DEPOSITION OF CITY OF HOUSTON (WANDA L. ANDREWS), produced as a witness at the instance of the Plaintiff and duly sworn, was taken in the above-styled and numbered cause on Tuesday, August 13, 2019, from 9:38 a.m. to 1:04 p.m., before JAMES M. PLAIR, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine at the CITY OF HOUSTON LEGAL DEPARTMENT, 900 Bagby, Third Floor, Houston, Texas 77002, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.	18 interoffice correspondence dated 12-07-09; HFD Assessment Executive Summary; HFD Assessment; HFD Special Bulletin; Executive Order 1-50 - HOU00002257 through 2318
25 Job No. 407947	19
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1 APPEARANCES	1 WANDA L. ANDREWS,
2 REPRESENTING PLAINTIFF UNITED STATES OF AMERICA:	2 having first been duly sworn, was examined and testified
3 Mr. Jeremy P. Monteiro	3 as follows:
4 Mr. Hector F. Ruiz	4 EXAMINATION
5 UNITED STATES DEPARTMENT OF JUSTICE EMPLOYMENT LITIGATION - CIVIL RIGHTS DIVISION 950 Pennsylvania Avenue, N.W. Washington, D.C. 20530-0001 202.616.9100 Telephone 202.514.1005 Fax Jeremy.Monteiro@usdoj.gov Email Hector.Ruiz@usdoj.gov Email	5 BY MR. RUIZ:
9 and	6 Q. Good morning, Ms. Andrews.
10 Mr. Keith Wyatt	7 A. Good morning.
11 UNITED STATES DEPARTMENT OF JUSTICE - U.S. ATTORNEY'S OFFICE 1000 Louisiana Street, Suite 2300 Houston, Texas 77002 713.567.9767 Telephone Elizabeth.Karpati@usdoj.gov Email Keith.Wyatt@usdoj.gov Email	8 Q. My name is Hector Ruiz. I'm with the 9 Department of Justice and I'm here today with Jeremy 10 Monteiro, who is also with the Civil Rights Division of 11 the Department of Justice and Mr. Keith Wyatt, to his 12 right; he's with the United States Attorney General's 13 Office here in Houston, Texas; and we're here in -- to 14 take your testimony in the case, the United States v. the 15 City of Houston.
16 REPRESENTING DEFENDANT CITY OF HOUSTON:	16 Would you please state your full name for 17 the record?
17 Ms. Deidra N. Sullivan CITY OF HOUSTON LEGAL DEPARTMENT 900 Bagby Street, Third Floor Houston, Texas 77002-2527 832.393.6457 Telephone 832.393.6259 Fax Deidra.Sullivan@houstontx.gov Email	18 A. Wanda Lynnette Andrews.
20 REPRESENTING PLAINTIFFS-INTERVENORS JANE DRAYCOTT AND PAULA KEYES:	19 Q. Would you please provide your business address?
21 Mr. S. Nasim Ahmad Mr. Dwain Gregory Capodice II 23 AHMAD & CAPODICE, P.L.L.C. 24900 Pitkin Road, Suite 300 The Woodlands, Texas 77386 832.767.3207 Telephone NAhmad@cline-ahmad.com Email	20 A. 1801 Smith Street, ZIP 77002 --
25	21 Q. Thank you.
	22 A. -- Houston, Texas.
	23 Q. Have you ever lived your deposition taken 24 before?
	25 A. Not that I recall, no.

<p style="text-align: right;">Page 5</p> <p>1 Q. Okay. I'm just going to cover some rules --</p> <p>2 A. Okay.</p> <p>3 Q. -- of depositions so that we know how to proceed</p> <p>4 today.</p> <p>5 First of all, everything that you and I</p> <p>6 discuss will be taken down by the court reporter here.</p> <p>7 It's really important that he be able to take down what I</p> <p>8 say and what you say, what I ask and how you answer.</p> <p>9 So go ahead and would you please let me</p> <p>10 finish my questions? Even if you think you know what I'm</p> <p>11 going to ask, go ahead and just let me finish my question</p> <p>12 and then you can give me a complete answer. Okay?</p> <p>13 A. Sure.</p> <p>14 Q. Also, it's important that you -- if the answer</p> <p>15 is "yes" that you answer "yes" and not a nod because he</p> <p>16 can only take down words and not a nod. Is that okay?</p> <p>17 A. That's not a nod?</p> <p>18 Q. Yes.</p> <p>19 A. Gotcha, yes.</p> <p>20 MS. SULLIVAN: It ends up being a gesture.</p> <p>21 Q. (BY MR. RUIZ) Now, if you don't hear my</p> <p>22 question, just go ahead and say so, and I'll restate it.</p> <p>23 Unless the attorney, your attorney, instructs you to not</p> <p>24 answer, you should answer the question.</p> <p>25 A. Okay.</p>	<p style="text-align: right;">Page 7</p> <p>1 What I'm going to hand you now is -- was</p> <p>2 marked yesterday as Exhibit 2. Okay? And what it is, is</p> <p>3 the Defendant's, City of Houston's, First Amended</p> <p>4 Objections and Responses to Plaintiff's Amended Notice of</p> <p>5 Federal Rules of Civil Procedure 30(b)(6) Deposition to</p> <p>6 Defendant, City of Houston.</p> <p>7 A. May I stop you for a moment?</p> <p>8 Q. Absolutely.</p> <p>9 A. I'm not exactly sure what I'm looking at here.</p> <p>10 Q. It's a notice that the Department of Justice</p> <p>11 sent to the City, requesting that they provide witnesses</p> <p>12 to provide information about specific topics.</p> <p>13 A. Oh, okay.</p> <p>14 Q. If you haven't seen it, you haven't seen it.</p> <p>15 It's okay.</p> <p>16 A. Okay. So I don't need to read through this?</p> <p>17 Q. No. If you haven't seen it --</p> <p>18 A. Okay.</p> <p>19 Q. -- we'll cover the different topics to make sure</p> <p>20 you understand what you are testifying about today.</p> <p>21 A. All right.</p> <p>22 Q. Okay. This is Exhibit 2. Go ahead and take a</p> <p>23 moment to review it.</p> <p>24 (Witness reviewing document)</p> <p>25 MS. SULLIVAN: Is there a question pending?</p>
<p style="text-align: right;">Page 6</p> <p>1 Q. Okay. If you need a break, just say so. I just</p> <p>2 ask, if there is a question pending, that the question be</p> <p>3 answered before the break, before you take the break.</p> <p>4 Is that okay?</p> <p>5 A. Yes.</p> <p>6 Q. You're under oath. Do you understand what</p> <p>7 testifying completely and truthfully means?</p> <p>8 A. I believe I do, yes.</p> <p>9 Q. Is there any reason that prevents you from</p> <p>10 testifying completely and truthfully today?</p> <p>11 A. No.</p> <p>12 Q. Ms. Andrews, I want to go through a process to</p> <p>13 identify the topics that you have been designated to</p> <p>14 testify about.</p> <p>15 I'm handing you what was marked yesterday</p> <p>16 as Deposition Exhibit 1. Okay. It's the Plaintiff's</p> <p>17 Amended Notice of Federal Rules of Civil Procedure</p> <p>18 30(b)(6) Deposition to Defendant, City of Houston.</p> <p>19 Would you go ahead and take a moment to</p> <p>20 review that, please? It's dated August 2nd, 2019.</p> <p>21 (Witness reviewing document)</p> <p>22 Q. (BY MR. RUIZ) Have you seen a copy of this</p> <p>23 notice before, Ms. Andrews?</p> <p>24 A. It doesn't look familiar, no.</p> <p>25 Q. Okay.</p>	<p style="text-align: right;">Page 8</p> <p>1 MR. RUIZ: No. I just asked her to review</p> <p>2 it.</p> <p>3 MS. SULLIVAN: Okay. Okay.</p> <p>4 Q. (BY MR. RUIZ) Ms. Andrews, have you seen</p> <p>5 Exhibit 2 before?</p> <p>6 A. No.</p> <p>7 Q. No, you haven't?</p> <p>8 A. No.</p> <p>9 Q. Okay. If you would, would you please turn to</p> <p>10 pages in Exhibit 2? It's Pages 4 of 21.</p> <p>11 A. (Witness complies).</p> <p>12 Q. I want you to look at the top of the page that</p> <p>13 says "1" and I'm going to refer to that as "topic 1".</p> <p>14 A. Okay.</p> <p>15 Q. Okay. Now, the City has designated you to</p> <p>16 testify with respect to topic 1(c), on the next page --</p> <p>17 A. Okay.</p> <p>18 Q. -- and 1(e) on the following page after that,</p> <p>19 Page 6 of 21.</p> <p>20 If you look on Page 5 of 21, at 1(c), it</p> <p>21 says: "Response, Defendant designates Wanda Andrews to</p> <p>22 testify regarding HFD training on Human Resource issues</p> <p>23 during the relevant time frame."</p> <p>24 A. Okay.</p> <p>25 Q. Do you see that?</p>

<p style="text-align: right;">Page 9</p> <p>1 A. I do.</p> <p>2 Q. Okay. And if you turn to Page 7 of 21, in the</p> <p>3 second supplemental response for 1(e), the last sentence,</p> <p>4 states that Houston will present Ms. Andrews as designated</p> <p>5 in its June 14th, 2019 response. Do you see that?</p> <p>6 A. I'm sorry. Repeat that.</p> <p>7 MS. SULLIVAN: I'm sorry.</p> <p>8 A. Oh, last sentence, yes.</p> <p>9 Q. (BY MR. RUIZ) Okay. And would you please</p> <p>10 review topics 1(c) and 1(e)?</p> <p>11 (Witness reviewing document)</p> <p>12 MS. SULLIVAN: You don't have to read all</p> <p>13 the objections and stuff like that.</p> <p>14 THE WITNESS: Oh.</p> <p>15 MS. SULLIVAN: That's legalese stuff. He</p> <p>16 just wants you to --</p> <p>17 THE WITNESS: To be clear on this one?</p> <p>18 MS. SULLIVAN: Yeah, this 1(c).</p> <p>19 THE WITNESS: Oh, okay. All right.</p> <p>20 Thanks. All right.</p> <p>21 Q. (BY MR. RUIZ) Are you prepared to respond to</p> <p>22 questions regarding these matters?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Now, would you please turn to topics</p> <p>25 2(c)? 2(c) you can find on Page 10 of 21, and 2(e), which</p>	<p style="text-align: right;">Page 11</p> <p>1 And would you please turn to topics 4(d)?</p> <p>2 4(d), you can find on Page 19 of 21, and 4(f), and you can</p> <p>3 also find that beginning on Page 19 of 21 and carrying</p> <p>4 over to 20 of 21.</p> <p>5 (Witness reviewing document)</p> <p>6 Q. (BY MR. RUIZ) Ms. Andrews, are you prepared to</p> <p>7 answer questions regarding those topics?</p> <p>8 A. Yes.</p> <p>9 Q. And the last topic that you have been designated</p> <p>10 to provide testimony as the City's representative is for</p> <p>11 topic 5, which is on Page 20, okay, and that topic is HFD</p> <p>12 complaint policy dissemination and training.</p> <p>13 Now, for topic 5, you have only been</p> <p>14 designated for the training aspect, not on the</p> <p>15 dissemination.</p> <p>16 A. Uh-hm.</p> <p>17 Q. Do you see that?</p> <p>18 MS. SULLIVAN: You have to say "yes".</p> <p>19 THE WITNESS: Yes. I'm sorry. Yes.</p> <p>20 Q. (BY MR. RUIZ) And are you prepared to respond</p> <p>21 to questions regarding this topic?</p> <p>22 A. Yes.</p> <p>23 Q. Thank you very much.</p> <p>24 Ms. Andrews, when did you learn that you</p> <p>25 were being designated as the City's representative for</p>
<p style="text-align: right;">Page 10</p> <p>1 is on Page 12 of 21. Okay.</p> <p>2 A. And 2(e)?</p> <p>3 Q. 2(e), yes, ma'am.</p> <p>4 A. Okay.</p> <p>5 Q. The City has also designated you to respond to</p> <p>6 questions about these topics.</p> <p>7 Are you prepared to respond to questions</p> <p>8 regarding these topics?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Would you please review topics 3(c) and</p> <p>11 3(e)?</p> <p>12 A. What page?</p> <p>13 Q. 3(c) is on Page 15 of 21 and it carries over</p> <p>14 into 16 of 21. 3(e) begins on Page 16 of 21 and carries</p> <p>15 over into Page 17 of 21.</p> <p>16 A. And what was on Page 17?</p> <p>17 MS. SULLIVAN: No. It was just the</p> <p>18 carryover.</p> <p>19 THE WITNESS: Just carry over.</p> <p>20 MS. SULLIVAN: Yeah, that's it.</p> <p>21 THE WITNESS: Oh, okay.</p> <p>22 Q. (BY MR. RUIZ) Are you prepared to respond to</p> <p>23 questions regarding these topics?</p> <p>24 A. Yes.</p> <p>25 Q. Thank you very much.</p>	<p style="text-align: right;">Page 12</p> <p>1 these topics?</p> <p>2 A. I think it may have been at least two weeks ago.</p> <p>3 Q. At least two weeks.</p> <p>4 Could it have been more than a month ago?</p> <p>5 Would it have been more than a month ago?</p> <p>6 A. I don't think it was more than a month ago.</p> <p>7 Q. So somewhere between a month and two weeks ago.</p> <p>8 Does that sound right?</p> <p>9 A. (No audible response).</p> <p>10 Q. You said at least two weeks ago, but not more</p> <p>11 than a month. Is that accurate --</p> <p>12 A. Yes.</p> <p>13 Q. -- or to the best of your recollection?</p> <p>14 A. To the best of my recollection.</p> <p>15 Q. You can read them more, if you want to,</p> <p>16 Ms. Andrews.</p> <p>17 Ms. Andrews, I just want to cover some very</p> <p>18 brief background before we go into the topics.</p> <p>19 A. Okay.</p> <p>20 Q. Can you please describe your educational</p> <p>21 background for me?</p> <p>22 A. My educational background, I have a Bachelor's</p> <p>23 Degree in Human Resources and I also have an HR</p> <p>24 certification in Human Resources as well.</p> <p>25 Q. When did you obtain your Bachelor's Degree in</p>

<p style="text-align: right;">Page 13</p> <p>1 Human Resources?</p> <p>2 A. Now, you want to know my age. 1978.</p> <p>3 Q. And you mentioned that you have an HR</p> <p>4 certification?</p> <p>5 A. Yes.</p> <p>6 Q. What is that, ma'am?</p> <p>7 A. Basically, you take a test on various topics</p> <p>8 dealing with HR issues to become certified in those</p> <p>9 particular areas.</p> <p>10 Q. What organization administers the test?</p> <p>11 A. This was administered by the Human Resources,</p> <p>12 HCRI, Certification Institute. It's also administered by</p> <p>13 SHRM, the Society of Human Resources, Human Resources and</p> <p>14 Management.</p> <p>15 Q. When did you obtain that certifications?</p> <p>16 A. Wow, hmm. I have had this certification for at</p> <p>17 least -- I think at least 15 years.</p> <p>18 Q. What is your current position with the City?</p> <p>19 A. My current position is Human Resources Manager.</p> <p>20 Q. And how long have you held that position?</p> <p>21 A. Since 2005, so about 14, soon to be 15 years.</p> <p>22 Q. And what are your responsibilities in that</p> <p>23 position?</p> <p>24 A. At this particular point, my responsibility</p> <p>25 primarily deals with training reeducation.</p>	<p style="text-align: right;">Page 15</p> <p>1 Q. Yes, ma'am.</p> <p>2 A. I met with the City attorneys, who gave me some</p> <p>3 instructions as far as how to --</p> <p>4 MS. SULLIVAN: Wait, wait, wait.</p> <p>5 MR. RUIZ: Wait.</p> <p>6 MS. SULLIVAN: Don't talk about what we</p> <p>7 discussed.</p> <p>8 THE WITNESS: Oh.</p> <p>9 Q. (BY MR. RUIZ) When you -- Thank you very much</p> <p>10 for trying to describe. I understand you were trying to</p> <p>11 answer the question, but any conversations you had with</p> <p>12 the City attorneys, those are between you and the City.</p> <p>13 They are privileged.</p> <p>14 So discussions you had with the City</p> <p>15 attorneys, do not describe the content of the discussions.</p> <p>16 A. Okay.</p> <p>17 Q. Okay. You can just say you met with the City</p> <p>18 attorneys.</p> <p>19 A. I met with the City attorneys.</p> <p>20 Q. Okay. Great.</p> <p>21 What else did you do?</p> <p>22 A. I don't know how to answer that. What else did</p> <p>23 I do in regards to?</p> <p>24 Q. To preparing for this deposition.</p> <p>25 A. Other than meeting with the City attorneys?</p>
<p style="text-align: right;">Page 14</p> <p>1 Q. Is there a particular department in the City</p> <p>2 that you are responsible for training and reeducation for?</p> <p>3 A. The Houston Fire Department.</p> <p>4 Q. The Houston Fire Department.</p> <p>5 And how long have you had responsibilities</p> <p>6 for training and reeducation for the Houston Fire</p> <p>7 Department?</p> <p>8 A. I would say, at this point, about nine years.</p> <p>9 Q. Nine years.</p> <p>10 And, before that, what were your</p> <p>11 responsibilities?</p> <p>12 A. Before that, I was responsible for Human</p> <p>13 Resources issues, such as FMLA, benefits administration,</p> <p>14 those types of issues, recruiting, onboarding.</p> <p>15 Q. Is that also for the Houston Fire Department?</p> <p>16 A. Yes.</p> <p>17 Q. Ms. Andrews, did you spend time preparing for</p> <p>18 this deposition?</p> <p>19 A. Yes.</p> <p>20 Q. How long did you spend?</p> <p>21 A. About two-and-a-half hours.</p> <p>22 Q. Two-and-a-half hours.</p> <p>23 Would you please describe to me everything</p> <p>24 you did to prepare for this deposition?</p> <p>25 A. Everything I did?</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Yes, ma'am.</p> <p>2 A. That's how I prepared.</p> <p>3 Q. Okay. Let me -- let me see if I can -- I'll try</p> <p>4 and help you out. Were you given any documents?</p> <p>5 A. I have documents, yes.</p> <p>6 Q. When you say you have documents, were they given</p> <p>7 to you?</p> <p>8 A. I had the opportunity to review them. I don't</p> <p>9 have them.</p> <p>10 Q. Who gave you the documents?</p> <p>11 A. The City attorney.</p> <p>12 Q. And when you say the "City attorney", do you</p> <p>13 mean the actual City Attorney?</p> <p>14 MS. SULLIVAN: Ron Lewis.</p> <p>15 A. Do you mean the head of Legal? Then no. It was</p> <p>16 Deidra Sullivan and Marjorie Cohen.</p> <p>17 Q. (BY MR. RUIZ) Which documents did they provide</p> <p>18 to you?</p> <p>19 A. Oh, Dear God.</p> <p>20 THE WITNESS: Am I to answer that?</p> <p>21 MS. SULLIVAN: You have to. I can't --</p> <p>22 THE WITNESS: Would you repeat the</p> <p>23 question, please?</p> <p>24 Q. (BY MR. RUIZ) Which documents did they provide</p> <p>25 to you?</p>

<p style="text-align: right;">Page 17</p> <p>1 A. Documents with some questions for possible</p> <p>2 consideration.</p> <p>3 Q. Did you review that document that had questions</p> <p>4 for possible consideration?</p> <p>5 A. Yes.</p> <p>6 Q. Did it help you in preparing for today's</p> <p>7 deposition?</p> <p>8 A. Yes.</p> <p>9 Q. Where is that document now?</p> <p>10 A. I'm not sure. I don't have it.</p> <p>11 Q. Was it taken back from you?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. How long did you review the document?</p> <p>14 A. Again, we were in the meeting for about</p> <p>15 two-and-a-half hours.</p> <p>16 Q. Was there any other documents that you were</p> <p>17 given?</p> <p>18 A. No, not that I recall.</p> <p>19 Q. Have you reviewed any deposition transcripts in</p> <p>20 preparation for this deposition?</p> <p>21 A. No.</p> <p>22 Q. Have you reviewed any complaint policies in</p> <p>23 preparation for this deposition?</p> <p>24 A. No.</p> <p>25 Q. Have you reviewed the conclusions of any OIG</p>	<p style="text-align: right;">Page 19</p> <p>1 response, recommendations, disciplinary actions,</p> <p>2 corrective measures, or any other actions, taken as a</p> <p>3 result of the findings issued with respect to OIG 09-424,</p> <p>4 and that's on Page 4 of 21 of Exhibit 2.</p> <p>5 Topic 1(c) is also a topic, and it's</p> <p>6 training of firefighters at Fire Station 54 conducted in</p> <p>7 response to OIG 09-424's findings (HOU5843) and</p> <p>8 Investigative Synopsis (HOU5851 through 5865).</p> <p>9 Do you see that?</p> <p>10 A. I do, yes.</p> <p>11 Q. Okay. Now, I'm handing to you what has been</p> <p>12 marked yesterday as Exhibit 3, and it's Bates stamped</p> <p>13 HOU00005843.</p> <p>14 Ms. Andrews, are you familiar with this</p> <p>15 document?</p> <p>16 A. No.</p> <p>17 Q. Have you ever seen it before?</p> <p>18 A. No.</p> <p>19 Q. Let me show you another document.</p> <p>20 It's -- it's been marked yesterday as</p> <p>21 Exhibit No. 4, okay, and it is HOU00005852, and it runs</p> <p>22 through HOU00005865, and I just want you to take a moment</p> <p>23 to review that document, please.</p> <p>24 (Witness reviewing document)</p> <p>25 MS. SULLIVAN: Do you want her to read the</p>
<p style="text-align: right;">Page 18</p> <p>1 investigation in preparation for this deposition?</p> <p>2 A. No.</p> <p>3 Q. Have you spoken with any members of the Houston</p> <p>4 Fire Department in preparation for this deposition?</p> <p>5 A. No.</p> <p>6 Q. When did you meet with the City attorneys to</p> <p>7 prepare for this deposition?</p> <p>8 A. I think that was Monday, August 5th, to the best</p> <p>9 of my recollection.</p> <p>10 Q. Did you take any notes during the meeting?</p> <p>11 A. No.</p> <p>12 Q. Have you read the complaint by -- filed by the</p> <p>13 United States in this lawsuit?</p> <p>14 A. No.</p> <p>15 Q. No. Okay.</p> <p>16 We're going to go ahead and dive into the</p> <p>17 topics, then. Thank you --</p> <p>18 A. Okay.</p> <p>19 Q. -- very much.</p> <p>20 Let's go ahead and begin with topic 1(c),</p> <p>21 and just so that we're clear on the same page, what you</p> <p>22 can do is look back at topic 1(c). It's Exhibit 2, and</p> <p>23 you can turn to -- topic 1 is described on Page 4 of 21</p> <p>24 and topic 1(c) is specifically on Page 5 of 21. Okay.</p> <p>25 Now, topic 1 is OIG 09-424, Defendant's</p>	<p style="text-align: right;">Page 20</p> <p>1 whole thing?</p> <p>2 MR. RUIZ: No.</p> <p>3 Q. (BY MR. RUIZ) Just, generally, I'm just going</p> <p>4 to ask you if you have seen that before.</p> <p>5 A. No, I have not.</p> <p>6 Q. You have not seen that document before?</p> <p>7 A. No.</p> <p>8 Q. So the document that you did you review in</p> <p>9 preparation for this deposition, it didn't -- it didn't</p> <p>10 look like either of these documents?</p> <p>11 A. No, it did not.</p> <p>12 Q. And the document you did review did help you</p> <p>13 prepare for this deposition?</p> <p>14 A. It did.</p> <p>15 MR. RUIZ: Deidra, I would kind of like to</p> <p>16 see it, the document that she reviewed in preparation for</p> <p>17 this deposition.</p> <p>18 MS. SULLIVAN: That one, Exhibit 2.</p> <p>19 MR. RUIZ: It was Exhibit 2?</p> <p>20 MS. SULLIVAN: Yes, yeah.</p> <p>21 MR. RUIZ: Okay.</p> <p>22 Q. (BY MR. RUIZ) Looking at Exhibit 2,</p> <p>23 Ms. Andrews, do you recognize this document, Exhibit 2, as</p> <p>24 the document that you reviewed?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 21</p> <p>1 Q. Exhibit 2 --</p> <p>2 A. Yes.</p> <p>3 Q. -- that's the document you reviewed?</p> <p>4 A. Yes.</p> <p>5 Q. Thank you very much.</p> <p>6 Ms. Andrews, are you familiar with OIG's</p> <p>7 investigation No. 09-424?</p> <p>8 A. No.</p> <p>9 Q. Okay. I'm going to ask you some questions that</p> <p>10 relate -- Okay. I want to know if the City provided any</p> <p>11 training specifically in response to the findings and</p> <p>12 synopsis for OIG's investigation into 09-424.</p> <p>13 A. Not that I'm aware of.</p> <p>14 Q. Okay.</p> <p>15 MR. RUIZ: I know it's early. Why don't we</p> <p>16 take a break so we can meet together real quick.</p> <p>17 MS. SULLIVAN: Okay.</p> <p>18 MR. RUIZ: Just a couple-minute break.</p> <p>19 (Recess from 10:06:14 a.m. to 10:11:09</p> <p>20 a.m.)</p> <p>21 Q. (BY MR. RUIZ) Ms. Andrews, where we left off, I</p> <p>22 was asking you about training that was -- well, we left</p> <p>23 off asking you about the training that was specifically</p> <p>24 performed in response to OIG's investigation into 09-424.</p> <p>25 Do you remember that?</p>	<p style="text-align: right;">Page 23</p> <p>1 this: Did you have this memo already when -- when you</p> <p>2 were preparing for this deposition?</p> <p>3 A. Yes.</p> <p>4 Q. And you just reviewed a memo that you already</p> <p>5 had in your possession?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Do you remember the approximate date of</p> <p>8 that memo, the one from Rick Flanagan?</p> <p>9 A. I'm thinking it was around March 2010.</p> <p>10 Q. Okay. Did that -- did that -- reviewing that</p> <p>11 memo help you prepare for this deposition?</p> <p>12 A. Yes.</p> <p>13 Q. Do you remember any -- any other memo that you</p> <p>14 reviewed?</p> <p>15 A. I don't recall another -- Wait.</p> <p>16 THE WITNESS: A question?</p> <p>17 MS. SULLIVAN: Nuh-uhm.</p> <p>18 THE WITNESS: Just go on?</p> <p>19 MS. SULLIVAN: Yeah.</p> <p>20 THE WITNESS: Would you restate that</p> <p>21 question?</p> <p>22 Q. (BY MR. RUIZ) Do you remember any other memo</p> <p>23 that you reviewed?</p> <p>24 A. That was the key memo. I don't recall another</p> <p>25 specifically.</p>
<p style="text-align: right;">Page 22</p> <p>1 A. Yes.</p> <p>2 Q. I want to turn back to my questions about your</p> <p>3 preparation for this deposition. Okay?</p> <p>4 Earlier, you identified one document that</p> <p>5 you reviewed that was given to you in preparation. Do you</p> <p>6 remember that?</p> <p>7 A. Yes.</p> <p>8 Q. Did you review any other documents in</p> <p>9 preparation for this deposition that were not given to</p> <p>10 you?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Which documents were those?</p> <p>13 A. There were various memos that was reviewed.</p> <p>14 There was also the Horton assessment.</p> <p>15 Q. Okay. Do you remember specifically which memos</p> <p>16 that you reviewed?</p> <p>17 A. I recall one memo from an Assistant Chief or a</p> <p>18 Fire Chief at the time, from Chief Rick Flanagan.</p> <p>19 Q. What was the memo about?</p> <p>20 A. That memo was about training.</p> <p>21 Q. And how did you obtain this memo?</p> <p>22 A. Someone must have given me a copy, because I</p> <p>23 don't think I got it directly from the Chief, but I did</p> <p>24 receive a copy for my files.</p> <p>25 Q. Okay. So when you reviewed -- Let me ask you</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Okay. Did you provide the documents that you</p> <p>2 reviewed to the City?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And did you get to keep those documents</p> <p>5 or did you turn them over to the City?</p> <p>6 A. I kept my originals.</p> <p>7 Q. You kept your originals. Okay.</p> <p>8 Where are those documents now?</p> <p>9 A. In my office.</p> <p>10 Q. Okay. Is your office here?</p> <p>11 A. No.</p> <p>12 MS. SULLIVAN: We provided those documents.</p> <p>13 MR. RUIZ: You did?</p> <p>14 MS. SULLIVAN: Yeah. They were in a couple</p> <p>15 of productions ago. She would have been the custodian of</p> <p>16 it.</p> <p>17 MR. RUIZ: That would have been thousands</p> <p>18 of records of -- You don't know it specifically? I mean,</p> <p>19 it doesn't identify it specifically, what she reviewed.</p> <p>20 Right?</p> <p>21 MS. SULLIVAN: No, but what she's talked</p> <p>22 about so far, it was provided with -- as a part of her</p> <p>23 files.</p> <p>24 MR. RUIZ: Okay. Deidra, would you be able</p> <p>25 to identify the Bates number?</p>

<p style="text-align: right;">Page 25</p> <p>1 MS. SULLIVAN: I would have to go back and</p> <p>2 pull it up.</p> <p>3 MR. RUIZ: Would you please, when you get a</p> <p>4 chance, can we identify the documents you reviewed in</p> <p>5 preparation for this deposition?</p> <p>6 MS. SULLIVAN: That, I don't -- Can we go</p> <p>7 off the record?</p> <p>8 MR. RUIZ: Yes.</p> <p>9 (Recess from 10:16:30 a.m. to 10:20:34</p> <p>10 a.m.)</p> <p>11 Q. (BY MR. RUIZ) Ms. Andrews, I'm going to show</p> <p>12 you something on this tablet, okay? And you can just, on</p> <p>13 the tablet, you can scroll up and down.</p> <p>14 A. Uh-hm.</p> <p>15 Q. Okay. What it is, it is Bates marked on this</p> <p>16 tablet as US015165 and the last electronic page is Bates</p> <p>17 stamped US015168, okay, which you can just scroll through</p> <p>18 that and tell me if you recognize that as the memo from</p> <p>19 Rick Flanagan that you reviewed in preparation for this</p> <p>20 deposition.</p> <p>21 A. I don't know if this is the same memo.</p> <p>22 Q. Okay. Thank you.</p> <p>23 You don't know if that -- You don't</p> <p>24 recognize this as --</p> <p>25 A. I don't recall that being the same memo.</p>	<p style="text-align: right;">Page 27</p> <p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 MR. RUIZ: We can go off the record.</p> <p>4 (Discussion off the record)</p> <p>5 (Recess from 10:23:34 a.m. to 10:25:49</p> <p>6 a.m.)</p> <p>7 Q. (BY MR. RUIZ) Ms. Andrews, when you say that</p> <p>8 you provided Ms. Sullivan with documents that you reviewed</p> <p>9 in a folder, okay, are we talking an electronic folder or</p> <p>10 hard copies of documents?</p> <p>11 A. Hard copies.</p> <p>12 Q. And when did you provide these hard copies of</p> <p>13 documents to Ms. Sullivan?</p> <p>14 A. Again, the latter part of July and additional</p> <p>15 copies on August 5th. I think there were some additional</p> <p>16 copies.</p> <p>17 Q. Okay. Approximately, how many hard copies --</p> <p>18 how many pages did you provide to her?</p> <p>19 A. I don't recall how many pages.</p> <p>20 Q. Other than the documents that you have described</p> <p>21 to me, various memos and the Horton assessment, can you</p> <p>22 remember any other document that you provided to</p> <p>23 Ms. Sullivan?</p> <p>24 A. There was some training from LegalWATCH.</p> <p>25 Q. Training from LegalWATCH.</p>
<p style="text-align: right;">Page 26</p> <p>1 Q. Okay.</p> <p>2 Ms. Andrews, do you recall giving the City</p> <p>3 a copy of everything that you reviewed?</p> <p>4 A. Everything that I reviewed, yes. To the best of</p> <p>5 my recollection, I did.</p> <p>6 Q. And did you give those copies to Ms. Sullivan?</p> <p>7 A. Whatever copies I provided, yes, I gave to</p> <p>8 Ms. Sullivan.</p> <p>9 Q. Thank you very much.</p> <p>10 MR. RUIZ: Do I have copies of everything</p> <p>11 that she gave to you?</p> <p>12 MS. SULLIVAN: Everything they gave, I</p> <p>13 produced. I would have to go back and see, because it was</p> <p>14 a couple of productions ago.</p> <p>15 MR. RUIZ: Okay. Okay.</p> <p>16 Q. (BY MR. RUIZ) Ms. Andrews, when did you review</p> <p>17 these materials?</p> <p>18 A. August 5th.</p> <p>19 Q. August 5th?</p> <p>20 A. Monday, August 5th.</p> <p>21 Q. And when did you provide these copies to</p> <p>22 Ms. Sullivan?</p> <p>23 A. We had provided -- I had provided copies a week</p> <p>24 or so before that.</p> <p>25 Q. So, like, July?</p>	<p style="text-align: right;">Page 28</p> <p>1 Can you describe the document which you are</p> <p>2 referring to when you state the "training from</p> <p>3 LegalWATCH"?</p> <p>4 A. The department hired a firm to come out and to</p> <p>5 conduct some training for the Command Staff.</p> <p>6 Q. When did that happen?</p> <p>7 A. That was April 2010.</p> <p>8 Q. Okay. And what does the document consist of?</p> <p>9 A. It was a handout from the company that did the</p> <p>10 training to follow along with a PowerPoint presentation.</p> <p>11 Q. Do you remember any other documents that you</p> <p>12 provided to the City?</p> <p>13 A. I also provided some PowerPoint presentations</p> <p>14 that I had created for the Houston Fire Department.</p> <p>15 Q. And when had you created those?</p> <p>16 A. Oh, gee. This goes back several years ago.</p> <p>17 Like, I can't give you a specific time frame, but it was</p> <p>18 more than a couple of years ago.</p> <p>19 Q. Okay. Why did you select these documents to</p> <p>20 provide to the City?</p> <p>21 A. I was asked to provide copies of any training we</p> <p>22 had provided to the Houston Fire Department.</p> <p>23 Q. Ms. Andrews, you mentioned the Horton</p> <p>24 assessment --</p> <p>25 A. Yes.</p>

<p>Page 29</p> <p>1 Q. -- as one of the documents that you reviewed and</p> <p>2 that you provided to the City. Is --</p> <p>3 A. Yes.</p> <p>4 Q. -- that correct?</p> <p>5 I'm going to hand you what I am marking as</p> <p>6 Exhibit -- 30(b)(6) Deposition Exhibit No. 13. Okay.</p> <p>7 (Exhibit 13 marked)</p> <p>8 MR. RUIZ: It's Bates stamped HOU00002257</p> <p>9 through HOU00002318.</p> <p>10 MS. SULLIVAN: Thank you.</p> <p>11 THE WITNESS: Okay.</p> <p>12 Q. (BY MR. RUIZ) Ms. Andrews, is this a copy of</p> <p>13 the assessment that you're referring to?</p> <p>14 A. Yes, it is.</p> <p>15 Q. Okay. Thank you.</p> <p>16 I'm going to turn your attention back to</p> <p>17 Exhibit 2, which is the City's designations as to who will</p> <p>18 provide testimony on specific topics. Okay.</p> <p>19 Will you please turn to topic 2? Topic 2</p> <p>20 is -- You can find it on Page 9 of 21, and it is</p> <p>21 OIG 09-407, Defendant's response, recommendations,</p> <p>22 disciplinary actions, corrective measures, or any other</p> <p>23 action, taken as a result of OIG's findings and synopsis</p> <p>24 issued with respect to OIG 09-407 (HOU5460, HOU1472-1495).</p> <p>25 Do you see that?</p>	<p>Page 31</p> <p>1 Q. Have you ever seen it before?</p> <p>2 A. No, I have not.</p> <p>3 Q. Thank you very much.</p> <p>4 I'm going to hand you what is Exhibit</p> <p>5 No. 8, okay, and it is HOU00001472 through HOU00001495,</p> <p>6 and I just want you to review it and I will ask you about</p> <p>7 your familiarity with it.</p> <p>8 MS. SULLIVAN: Can we go off the record</p> <p>9 while she's reviewing? I'm going to go see if I can find</p> <p>10 these documents.</p> <p>11 MR. RUIZ: Okay.</p> <p>12 (Recess from 10:34:50 a.m. to 10:43:51</p> <p>13 a.m.)</p> <p>14 Q. (BY MR. RUIZ) Ms. Andrews, before I move on to</p> <p>15 these documents -- or I'm sorry.</p> <p>16 Did you complete your review of the exhibit</p> <p>17 that you were reviewing?</p> <p>18 A. Yes, I did.</p> <p>19 Q. Have you ever seen it before?</p> <p>20 A. No, I have not.</p> <p>21 Q. Are -- are you familiar with that -- that</p> <p>22 investigation?</p> <p>23 A. No, I'm not.</p> <p>24 Q. You're not. Okay.</p> <p>25 Before I move on to ask you questions about</p>
<p>Page 30</p> <p>1 A. I do, yes.</p> <p>2 Q. And if you refer to topic 2(c), on the next</p> <p>3 page, that -- that topic is training of firefighters at</p> <p>4 Fire Station 54, conducted in response to OIG 09-407</p> <p>5 findings and synopsis report.</p> <p>6 Do you see that?</p> <p>7 A. I do, yes.</p> <p>8 Q. Now, the City designated you to answer questions</p> <p>9 on this subtopic. Do you see that?</p> <p>10 A. Are you referring to (c) as a subtopic?</p> <p>11 Q. Yes, ma'am.</p> <p>12 A. Yes.</p> <p>13 Q. If you look down to the response, the City</p> <p>14 designated you to answer questions on this subtopic.</p> <p>15 Do you see that?</p> <p>16 A. Yes.</p> <p>17 Q. I'm going to hand you what's been Bates stamped</p> <p>18 as Exhibit 7. It is Bates stamped -- It was marked -- I'm</p> <p>19 sorry -- marked as Exhibit 7 yesterday, and the Bates</p> <p>20 stamp on it is HOU00005460 through HOU00005462, and I want</p> <p>21 you to just review that document for a minute, please.</p> <p>22 (Witness reviewing document)</p> <p>23 Q. (BY MR. RUIZ) Ms. Andrews, are you familiar</p> <p>24 with this document?</p> <p>25 A. No, I'm not.</p>	<p>Page 32</p> <p>1 the investigation detailed in Exhibit 8, which is</p> <p>2 OIG 09-407, I need you to turn back to topic 1(e).</p> <p>3 A. Uh-hm.</p> <p>4 Q. Would you please turn back to topic 1(e)? You</p> <p>5 can find it on Page 6 of 21 in Exhibit 2.</p> <p>6 Topic 1(e) relates to OIG 09-424. Topic</p> <p>7 1(e) is: "Defendant's efforts to prevent reoccurrence of</p> <p>8 the actions complained of in OIG 09-424, including but not</p> <p>9 limited to the cold water being turned off in shower in</p> <p>10 women's bathroom; speakers being turned off in women's</p> <p>11 dormitory; males using the women's bathroom and urinating</p> <p>12 outside of the toilet; the removal of mattresses from the</p> <p>13 women's dormitory; the removal of items from lockers in</p> <p>14 women's dormitory; and leaving of trash in the women's</p> <p>15 dormitory."</p> <p>16 Do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. Ms. Andrews, after OIG 09-424 was completed and</p> <p>19 OIG formed 09-424 findings and investigative synopsis was</p> <p>20 issued, were any efforts taken to prevent the reoccurrence</p> <p>21 of the actions complained of by Ms. Draycott in 09-424?</p> <p>22 A. I'm not aware of any.</p> <p>23 Q. Now, I want to turn now to topic 2, the two</p> <p>24 documents that we were reviewing, and I want to turn first</p> <p>25 to -- Well, topic 2 is OIG 09-407, Defendant's response,</p>

<p style="text-align: right;">Page 33</p> <p>1 recommendations, disciplinary actions, corrective 2 measures, or any other action, taken as a result of OIG's 3 findings and synopsis issued with respect to OIG 09-407. 4 Do you see that? 5 A. Yes. 6 Q. Okay. Looking at Exhibits 7 and 8 that you 7 reviewed, did the City conduct any training? 8 MS. SULLIVAN: This is that one. 9 THE WITNESS: Okay. 10 Q. (BY MR. RUIZ) Did the City conduct any training 11 of firefighters at Station 54 in response to OIG's 12 09-407's findings or investigative synopsis? 13 A. Not to my knowledge. 14 Q. I want to turn now to topic 2(e), and topic 2(e) 15 you can find on Page 12 of 21, and topic 2(e) is 16 Defendant's efforts to prevent reoccurrence of actions 17 complained of, including but not limited to the racial and 18 gender slurs written in the women's dormitory at Fire 19 Station 54. 20 Do you see that? 21 A. I do. 22 Q. Now, after OIG's 407's investigation was 23 completed and OIG 09-407's investigative synopsis -- and 24 investigative synopsis was issued, were any efforts made 25 to prevent the reoccurrence of the actions complained of</p>	<p style="text-align: right;">Page 35</p> <p>1 the complaint in 09-407? 2 A. No. 3 Q. You mean you can't describe any? 4 A. I can't -- 5 Q. Okay. 6 A. -- describe any. 7 Q. We're going to go ahead and move on to topic 8 No. 3, Ms. Andrews. Okay. Topic No. 3 is -- you can find 9 on Page 14 of 21. Okay. 10 And on Page 14 of 21, topic 3 is OIG 11 10-311, Defendant's response, recommendations, 12 disciplinary actions, corrective measures, or any other 13 action, taken as a result of the findings issued with 14 respect to OIG 10-311 (HOU5671 through 5705). 15 Do you see that? 16 A. Yes, I do. 17 Q. Okay. And if you turn to Page 15 of the City's 18 designations, which is Exhibit 2, you can please review 19 subtopic 2(c), which is training of firefighters at Fire 20 Station 54 conducted in response to OIG 09-424's findings 21 and investigative synopsis. 22 Do you see that? 23 A. Yes, I do. 24 Q. Ms. Andrews, I'm going to hand you what's 25 Exhibit 9, okay, and Exhibit 9 was marked yesterday.</p>
<p style="text-align: right;">Page 34</p> <p>1 in 09-407? 2 A. Not to my knowledge. 3 Q. What efforts have, if any -- Let me back up. 4 Let me strike that. 5 Without limitation as to time, as in after 6 the issuance of those -- this synopsis and findings for 7 OIG No. 09-407, what efforts has the City taken to prevent 8 the reoccurrence of events described or made the basis of 9 09-407? 10 MS. SULLIVAN: Objection. 11 A. It sounds like you're asking me -- 12 MS. SULLIVAN: Objection. Confusing. But 13 go ahead. 14 A. It sounds like you're asking me the same 15 question I just answered, and that would be not to my 16 knowledge. 17 Q. (BY MR. RUIZ) Since this -- since the issuance 18 up until today, you know of no efforts that have been 19 taken to prevent the reoccurrence of those events 20 described in 09-407. Is that correct? 21 A. Ask that question again. 22 Q. From the issuance of the synopsis and the 23 findings all the way through today, you can't describe any 24 actions or efforts taken by the City to prevent the 25 reoccurrence of the actions described or made the basis of</p>	<p style="text-align: right;">Page 36</p> <p>1 It is HOU0005671 through HOU00002834. 2 Okay. After you do, I'm going to ask you about your 3 familiarity with this document. 4 (Witness reviewing document) 5 Q. (BY MR. RUIZ) Are you -- Have you had a chance 6 to review the document, Ms. Andrews? 7 A. I have. 8 Q. Are you familiar with this document? 9 A. No, I am not. 10 Q. Have you ever seen it before? 11 A. No, I have not. 12 Q. Okay. Now, are you aware of any training that 13 the City conducted of firefighters at Station 54 in 14 response to OIG's 10-311 investigative summary, that 15 document in front of you which is Exhibit 9? 16 A. No, I'm not. 17 MR. RUIZ: Let's take a short break. 18 MS. SULLIVAN: Okay. 19 (Recess from 10:55:14 a.m. to 11:11:10 20 a.m.) 21 Q. (BY MR. RUIZ) Ms. Andrews, before we stopped 22 for the break, we were covering topic 3, and I want to 23 turn your attention now to subtopic 3(e). 24 You can find it on Page 16 of the City's 25 designations, which is Exhibit 2. At the bottom of</p>

<p style="text-align: right;">Page 37</p> <p>1 Page 16, topic 3(e) is the Defendant's efforts to prevent 2 reoccurrence of actions complained of in OIG 10-311 3 (HOU5671 through 5705). 4 Do you see that? 5 A. Yes. 6 Q. Ms. Andrews, after OIG 10-311 was completed, 7 were any efforts taken to prevent reoccurrence of the 8 actions complained of in OIG 10-311? 9 A. Not to my knowledge, no. 10 Q. Ms. Andrews, I want you -- I want to turn your 11 attention to topic 4, and you can find topic 4 on Page 18 12 of Exhibit 2. 13 A. Okay. 14 Q. It's Page 18 of 21 and topic 4 is: "Thompson & 15 Horton, LLP and Lemond & Lemond, LLC HFD Assessment 16 (HOU2259 through 2318) - Defendant's request for 17 assessment, review, response implementation, or any other 18 action taken in response to the assessment of the 19 effectiveness of HFD's policies, practices, and training 20 related to workplace harassment and discrimination." 21 Do you see that? 22 A. Yes, I do. 23 Q. Okay. Now, we have previously marked 24 Exhibit 13, I think, and I'm going to ask you some 25 questions about Exhibit 13. Okay.</p>	<p style="text-align: right;">Page 39</p> <p>1 A. I do. 2 Q. And do you see that the City has designated you 3 to answer questions about training of firefighters at Fire 4 Station 54? 5 A. Yes. 6 Q. Now, did the City conduct any training of 7 firefighters at Fire Station 54 in response to Exhibit 13? 8 A. Well, we conducted training, but not just for 9 Station 54. I guess my answer would be yes. 10 Q. Okay. 11 The training that you are describing or 12 that you -- that you said was conducted, when was it 13 conducted? 14 A. I think this began in January of 2010. 15 Q. Did it continue after January 2010? 16 A. Yes. We had face-to-face training for -- I 17 think it lasted only two years, two-and-a-half years, to 18 get to everyone. 19 Q. What was the format of the training? 20 A. That -- There was a handout. I can't recall if 21 there was a PowerPoint presentation. I think at this 22 point, there was a handout that was used in the training. 23 Q. Okay. Was the format -- When I'm asking about 24 the format, was it -- was it live training, with a live 25 presenter?</p>
<p style="text-align: right;">Page 38</p> <p>1 Are you familiar with Exhibit 13? 2 A. Yes. 3 Q. Okay. What is Exhibit 13? 4 A. It is the Houston Fire Department's Assessment 5 Executive Summary by Thompson & Horton. 6 Q. Is it the -- Is the document what is described 7 in topic 4 Thompson & Horton, L.L.P.'s and Lemon & Lemon, 8 L.L.C.'s HFD assessment? 9 A. Yes. 10 Q. Is that what it is? 11 A. Yes. 12 Q. And how are you familiar with it? 13 A. I received a copy of it. 14 Q. When did you receive a copy of it? 15 A. Gee, I guess shortly after it was completed. 16 This is '09. Possibly sometime in '010, 2010. 17 Q. Thank you very much. 18 Would you please refer to topic 4(d), which 19 can be found on Page 19 of the City's responses and 20 designations? 21 A. (Witness complies). 22 Q. 4(d) is training of firefighters at Fire 23 Station 54 conducted in response to the assessment HOU2259 24 through 2318. 25 Do you see that, Ms. Andrews?</p>	<p style="text-align: right;">Page 40</p> <p>1 A. Oh, it was face-to-face training. 2 Q. Was it -- The face-to-face training, what -- 3 what was the size of the groups that were being trained at 4 one time? 5 A. I guess it varied, depending on which district 6 we were dealing with at the time. It could be anywhere 7 from 15 to 30 individuals. 8 Q. I want to ask you about the phrase. When you 9 say "face-to-face training", that means -- Does that mean 10 there was a live presenter? 11 A. Yes. We went out to the stations. 12 Q. Okay. Did you yourself participate in the 13 training? 14 A. Yes, I did. 15 Q. So when you say that, "We went out to the 16 stations," who is "we"? 17 A. The training was initially started by City HR 18 and I was privy to observe them for a few months or so 19 before I became active in the training myself. 20 Q. Is City HR, does that actually mean the City's 21 HR Department or is that the City HR Company? 22 A. That is the City's HR Department. 23 Q. So it was the City's Human Resources Department 24 that was putting on the training? 25 A. Yes.</p>

<p style="text-align: right;">Page 41</p> <p>1 Q. Do you remember the names of individuals in the</p> <p>2 City's HR who, other than yourself, that was putting on</p> <p>3 the training?</p> <p>4 A. There were two I recall. There was Kelly</p> <p>5 Shreck. I think she was a manager at the time, and then</p> <p>6 Juan Padilla worked for her. He was a trainer as well.</p> <p>7 Q. Okay.</p> <p>8 At the time that the -- Ms. Shreck and</p> <p>9 Mr. Padilla were conducting the training, what were their</p> <p>10 positions with the City?</p> <p>11 A. Oh, their official classifications?</p> <p>12 Q. Yes, ma'am.</p> <p>13 A. I -- I'm not certain of that. I know Ms. Shreck</p> <p>14 was a manager. What kind of manager, I'm not sure. And</p> <p>15 Mr. Padilla was a trainer, if I recall.</p> <p>16 Q. In the organizational chart of the Human</p> <p>17 Resources Department, would they -- were -- Would they</p> <p>18 be -- Would Ms. Shreck be a lateral position to you, as a</p> <p>19 manager?</p> <p>20 A. Yes.</p> <p>21 Q. She would be a lateral position.</p> <p>22 A. Hold on. Yes, yes.</p> <p>23 Q. She didn't report to you?</p> <p>24 A. No, she did not report to me.</p> <p>25 Q. How about Mr. Padilla?</p>	<p style="text-align: right;">Page 43</p> <p>1 "EEOC, Understanding Your Rights and Responsibilities" is</p> <p>2 about?</p> <p>3 A. I think it primarily covered Title VII,</p> <p>4 discrimination, age discrimination, retaliation.</p> <p>5 Q. Is there anything else that that topic covered?</p> <p>6 A. Sexual harassment.</p> <p>7 Q. Were any other topics that that -- or any other</p> <p>8 content that that topic covered?</p> <p>9 A. Those are the ones that I can recall.</p> <p>10 Q. Now, had the City provided training on that</p> <p>11 prior to January of 2010?</p> <p>12 A. Not to my knowledge.</p> <p>13 Now, you're asking about City HR, so I</p> <p>14 can't answer that definitively, other than not to my</p> <p>15 knowledge. They are separate from Human -- separate from</p> <p>16 the Fire Department, is what I'm saying.</p> <p>17 Q. Okay. I'm sorry.</p> <p>18 Do you know if either the Fire Department</p> <p>19 or City HR ever provided personnel in the Fire Department</p> <p>20 with the "EEOC, Understanding Your Rights and</p> <p>21 Responsibilities" training prior to January of 2010?</p> <p>22 A. Not to my knowledge.</p> <p>23 Q. Ms. Andrews, I want to make sure I understand</p> <p>24 the distinction between City HR and the Fire Department.</p> <p>25 You work for the Human Resources Department</p>
<p style="text-align: right;">Page 42</p> <p>1 A. No. Mr. Padilla reported directly to Kelly</p> <p>2 Shreck.</p> <p>3 Q. What topics were presented with respect to this</p> <p>4 training that you're describing?</p> <p>5 A. I think the -- the training was "EEOC,</p> <p>6 Understanding Your Rights and Responsibilities".</p> <p>7 Q. Were there any other topics that were presented?</p> <p>8 A. I think we also talked about the process of</p> <p>9 filing a complaint as a part of the training, and there</p> <p>10 were also training scenarios.</p> <p>11 Q. Do you remember -- I'm sorry.</p> <p>12 Do you remember any other topics that were</p> <p>13 presented?</p> <p>14 A. No.</p> <p>15 Q. Okay. Three topics that you have identified</p> <p>16 that were presented were EEOC, Understanding Your Rights</p> <p>17 and Responsibilities. Is that correct?</p> <p>18 A. Yes.</p> <p>19 Q. The process of filing complaints. Is that</p> <p>20 correct?</p> <p>21 A. Yes.</p> <p>22 Q. And training scenarios. Is that correct?</p> <p>23 A. Yes.</p> <p>24 Q. Okay.</p> <p>25 Will you please tell me what the topic</p>	<p style="text-align: right;">Page 44</p> <p>1 for the Fire Department. Right?</p> <p>2 A. Yes.</p> <p>3 Q. And the distinction, if I understand it, that</p> <p>4 you were drawing was that this was put on by the City's</p> <p>5 Human Resources Department?</p> <p>6 A. Yes.</p> <p>7 Q. Ms. Shreck and Mr. Padilla, did they work for</p> <p>8 City HR?</p> <p>9 A. Yes.</p> <p>10 Q. So they were not -- I mean, they may have done</p> <p>11 Human Resource work, but they weren't specifically</p> <p>12 assigned to the Houston Fire Department?</p> <p>13 A. No, they were not.</p> <p>14 Q. But you were?</p> <p>15 A. Yes.</p> <p>16 Q. Thank you.</p> <p>17 Now, during the time period that the</p> <p>18 training was being conducted, I believe you said that it</p> <p>19 was a period of over two years. Is --</p> <p>20 A. Yes --</p> <p>21 Q. -- that correct?</p> <p>22 A. -- if I recall correctly.</p> <p>23 Q. Okay. Did you present the -- the topic "EEOC,</p> <p>24 Understanding Your Rights and Responsibilities" yourself?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 45</p> <p>1 Q. And did you present on the topic of process of</p> <p>2 filing a complaint?</p> <p>3 A. Yes.</p> <p>4 Q. And did you present on different training</p> <p>5 scenarios?</p> <p>6 A. Yes.</p> <p>7 Q. Okay.</p> <p>8 The second topic that you -- that you</p> <p>9 mentioned was the process of filing a complaint. Can you</p> <p>10 describe what that training was about?</p> <p>11 A. Basically, if I recall correctly, it was about</p> <p>12 the various options to file a complaint, City, State or</p> <p>13 Federal, or Ol- -- Well, Houston Fire Department, OIG,</p> <p>14 State, Federal.</p> <p>15 Q. You say it was applied to the various different</p> <p>16 options, City, State or Federal. Is that what you said?</p> <p>17 A. Yes.</p> <p>18 Q. And then you also stated City HFD. Is that</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. OIG, and you also said State and Federal. Is</p> <p>22 that --</p> <p>23 A. Yes.</p> <p>24 Q. -- correct?</p> <p>25 Well, what was the purpose of the</p>	<p style="text-align: right;">Page 47</p> <p>1 Q. Ms. Andrews, I want to go back to the second</p> <p>2 topic that you said that you were trained on, the process</p> <p>3 of filing a complaint.</p> <p>4 A. Uh-hm.</p> <p>5 Q. Yes. Had that training been provided before --</p> <p>6 A. Not to my knowledge.</p> <p>7 Q. -- either by the City or the Houston Fire</p> <p>8 Department?</p> <p>9 A. Here again, not to my knowledge.</p> <p>10 Q. The training sessions that you refer to that</p> <p>11 were presented as part of the training, can you tell me</p> <p>12 what the training scenarios are or just describe briefly</p> <p>13 what you are referring to when you say "training</p> <p>14 scenarios"?</p> <p>15 A. Hmm, I can only recall one in particular,</p> <p>16 whereby a female officer was being inappropriate with a</p> <p>17 newly-hired firefighter, and that was relating to sexual</p> <p>18 harassment.</p> <p>19 I can't recall the others. I think there</p> <p>20 were two or three others. I can't recall specifically</p> <p>21 what those were.</p> <p>22 Q. Okay. So "scenario" is like -- Let me see if I</p> <p>23 can -- if I understand it.</p> <p>24 Is this scenario a training tool where you</p> <p>25 give the persons being trained, like, a situation that</p>
<p style="text-align: right;">Page 46</p> <p>1 instruction on process -- on the process of filing a</p> <p>2 complaint?</p> <p>3 A. I'm sorry?</p> <p>4 Q. Just -- Would you just describe the training</p> <p>5 that was provided with respect to the process of filing a</p> <p>6 complaint?</p> <p>7 A. We discussed Title VII issues as far as</p> <p>8 discrimination, the topics I mentioned earlier, and if</p> <p>9 individuals felt they were being impacted in these areas,</p> <p>10 the remedy for addressing those issues. So therein came</p> <p>11 the process for filing complaints.</p> <p>12 Q. Okay.</p> <p>13 Was attendance at these training sessions</p> <p>14 provided between January of 2010 and two years later, was</p> <p>15 it optional or required?</p> <p>16 A. It was mandatory.</p> <p>17 Q. Did the City, in some way, or did the City or</p> <p>18 the Fire Department, in some way track who had attended</p> <p>19 this mandatory training?</p> <p>20 A. Yes, we did.</p> <p>21 Q. How did you -- How did the City or the Fire</p> <p>22 Department track how a person attended mandatory training?</p> <p>23 A. There were sign-in sheets with employee numbers</p> <p>24 attached and this information was then entered into an HFD</p> <p>25 training database at the time.</p>	<p style="text-align: right;">Page 48</p> <p>1 they may come across and you, like, identify what's going</p> <p>2 on and train them on what they should do and what they</p> <p>3 should not do? Is that what you mean by "training</p> <p>4 scenario"?</p> <p>5 A. Yes, I do.</p> <p>6 Q. Okay. To your knowledge, had the -- had City HR</p> <p>7 or the HFD provided training scenarios -- Well, let me</p> <p>8 back up.</p> <p>9 These training scenarios, did they cover</p> <p>10 Title VII or instances that would implicate Title VII?</p> <p>11 A. Yes.</p> <p>12 Q. And had the City or the Houston Fire Department</p> <p>13 used these training scenarios before the assessment was</p> <p>14 administered and distributed to train Houston Fire</p> <p>15 Department personnel before?</p> <p>16 A. Not to my knowledge.</p> <p>17 Q. Ms. Andrews, the training that you described</p> <p>18 that has been conducted in response to the assessment</p> <p>19 which is Exhibit 13, has that continued beyond that 2010</p> <p>20 to, you know, two-year time frame afterwards?</p> <p>21 A. Yes, it has.</p> <p>22 Q. Is it still the same format?</p> <p>23 A. It's taken different formats.</p> <p>24 Q. Is it still being con- -- Is it still the City's</p> <p>25 or the Houston Fire Department's practice to conduct it</p>

<p>Page 49</p> <p>1 today?</p> <p>2 A. Yes.</p> <p>3 Q. What's the current format of the training that</p> <p>4 is provided?</p> <p>5 A. We provide newly-promoted officers training for</p> <p>6 our new officers. We have also just completed a biannual</p> <p>7 training department-wide.</p> <p>8 Q. I'm sorry. What was that called?</p> <p>9 A. Biannual training on sexual harassment and</p> <p>10 retaliation. We also train our cadets on Executive Order</p> <p>11 1-50.</p> <p>12 Q. Is there any other training that you can recall</p> <p>13 that the City is doing today?</p> <p>14 A. There have been times when I might get a call</p> <p>15 from a Chief or someone who may be having an issue with</p> <p>16 their group and they will ask me to put together something</p> <p>17 specific for that area, to address those issues.</p> <p>18 Q. When you say for a group, like, for a specific</p> <p>19 station?</p> <p>20 A. Or a division --</p> <p>21 Q. Okay.</p> <p>22 A. -- and/or station.</p> <p>23 Q. The -- the training that is -- I want to go</p> <p>24 through the different types of training that you have</p> <p>25 described here, the newly-promoted officer's training, the</p>	<p>Page 51</p> <p>1 Go ahead and answer.</p> <p>2 A. I can tell you when I started participating.</p> <p>3 That would have been in late 2013-'14.</p> <p>4 Q. (BY MR. RUIZ) Do you know when newly-promoted</p> <p>5 officer training started being -- Well, okay.</p> <p>6 Let me ask you this: Is newly-promoted</p> <p>7 officer training required of all newly-promoted officers?</p> <p>8 A. We do provide that, yes.</p> <p>9 Q. It's required --</p> <p>10 A. Yes.</p> <p>11 Q. -- of newly-promoted officers?</p> <p>12 A. Yes.</p> <p>13 Q. How long has it been required of newly-promoted</p> <p>14 officers?</p> <p>15 A. Here again, to my knowledge, I got involved</p> <p>16 probably in 2013, if not '14.</p> <p>17 MR. CAPODICE: Objection. Nonresponsive.</p> <p>18 Q. (BY MR. RUIZ) Do you know when it was first</p> <p>19 required of newly-promoted officers?</p> <p>20 A. No, I do not.</p> <p>21 Q. Ms. Andrews, do you know who would know when</p> <p>22 newly-promoted officer training was first required of</p> <p>23 newly-promoted officers?</p> <p>24 A. Hmm, I don't know if I can pinpoint anyone in</p> <p>25 particular.</p>
<p>Page 50</p> <p>1 biannual training and the -- the -- I think you said</p> <p>2 Executive Order 1-50 training for cadets. Is that right?</p> <p>3 A. Yes.</p> <p>4 Q. And I want to go through those so I can</p> <p>5 understand exactly what those are.</p> <p>6 A. Okay.</p> <p>7 Q. The newly-promoted officer training, would you</p> <p>8 please describe that training to me --</p> <p>9 A. Uhm --</p> <p>10 Q. -- as it relates to Title VII employment</p> <p>11 discrimination issues?</p> <p>12 A. Well, here again, we use Executive Order 1-50,</p> <p>13 the Mayor's policy on discrimination or retaliation as a</p> <p>14 part of that training.</p> <p>15 We also talk about documentation, the</p> <p>16 process for documenting instances that occur, and we also</p> <p>17 use, again here, training scenarios on what the</p> <p>18 newly-promoted officers may encounter as new officers in</p> <p>19 their stations.</p> <p>20 Q. Can you recall anything else that it covers?</p> <p>21 A. That's about three hours, so that takes about</p> <p>22 three hours to get all that done.</p> <p>23 Q. When was newly-promoted officer training</p> <p>24 initiated?</p> <p>25 MS. SULLIVAN: Objection. Vague.</p>	<p>Page 52</p> <p>1 Q. You don't?</p> <p>2 A. No. I -- To be specific, I can't tell you who</p> <p>3 would know specifically.</p> <p>4 Q. Okay. Thank you.</p> <p>5 You also mentioned that there was biannual</p> <p>6 training that was provided.</p> <p>7 A. Yes.</p> <p>8 Q. Would you please describe the biannual training</p> <p>9 that's provided?</p> <p>10 A. The biannual training began -- I was asked by my</p> <p>11 Executive Chief to create, here again, another PowerPoint</p> <p>12 presentation to address the issue of sexual</p> <p>13 harassment/retaliation, and we began this training on --</p> <p>14 in August of last year and we are still doing some</p> <p>15 training on that issue.</p> <p>16 Q. Okay. You said you were asked by your Executive</p> <p>17 Chief?</p> <p>18 A. My Executive Fire Chief, yes.</p> <p>19 Q. Who is that?</p> <p>20 A. Rodney West.</p> <p>21 Q. And you reference a date, August of 2018. Is</p> <p>22 that -- or you said August of last year?</p> <p>23 A. Yes.</p> <p>24 Q. That would be August of 2018?</p> <p>25 A. August of 2018.</p>

<p>Page 53</p> <p>1 Q. Is that when he asked you or is that when the</p> <p>2 biannual training began?</p> <p>3 A. That's when the training actually began.</p> <p>4 Q. And that training addresses sexual harassment</p> <p>5 and retaliation. Is that correct?</p> <p>6 A. Yes.</p> <p>7 Q. Who chose the topics that the biannual training</p> <p>8 should cover?</p> <p>9 A. I'm not sure. I -- And the reason I say that is</p> <p>10 that was not the only topic covered in the biannual</p> <p>11 training.</p> <p>12 Q. Okay. What other topics does it cover?</p> <p>13 A. Oh, boy.</p> <p>14 Q. You know what? Let's narrow it down.</p> <p>15 What other topics does it cover with</p> <p>16 respect to Title VII and employment discrimination?</p> <p>17 A. That would have been my piece and that's the</p> <p>18 only section that would have addressed that.</p> <p>19 Q. So you personally addressed the sexual</p> <p>20 harassment and retaliation component of that training?</p> <p>21 A. Yes.</p> <p>22 Q. Do you know if any -- do you know if any other</p> <p>23 Title VII or employment discrimination issues are</p> <p>24 addressed during that training, even if it's not you</p> <p>25 that's the actual Human Resource professional that's doing</p>	<p>Page 55</p> <p>1 employee's payroll number, and we enter that into our</p> <p>2 training system on our side, Talent Management, and I</p> <p>3 think it's also entered on the fire training database as</p> <p>4 well.</p> <p>5 Q. So there is an electronic system capable of, I</p> <p>6 guess -- Let me back up.</p> <p>7 If you wanted to understand or know whether</p> <p>8 a specific person actually took the required training,</p> <p>9 what would you do?</p> <p>10 A. We could run a report to determine that.</p> <p>11 Q. When you said it was a classroom setting --</p> <p>12 A. Yes.</p> <p>13 Q. -- do attendees actually go to a -- a specific</p> <p>14 area to take the training?</p> <p>15 A. Yes. All the training was conducted at the</p> <p>16 Val Jahnke Training Facility.</p> <p>17 Q. I'm sorry. Would you pronounce the name of that</p> <p>18 place again?</p> <p>19 A. HFD's training facility --</p> <p>20 Q. Okay.</p> <p>21 A. -- also known as Val Jahnke, J-A-H-N-K-E,</p> <p>22 Training Facility.</p> <p>23 Q. Thank you.</p> <p>24 And the other ongoing training that you</p> <p>25 mentioned was training for cadets on EO 1-50. Do you</p>
<p>Page 54</p> <p>1 it?</p> <p>2 A. No, I do not know.</p> <p>3 Q. Do you know that there are -- Are there any</p> <p>4 other Title VII or employment discrimination issues that</p> <p>5 are addressed during that training?</p> <p>6 A. Not to my knowledge no.</p> <p>7 Q. Okay. Who is required to attend biannual --</p> <p>8 this biannual training?</p> <p>9 A. Everyone in the Houston Fire Department.</p> <p>10 Q. Is that sworn-in and non-sworn personnel?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. What is the format of the training?</p> <p>13 A. Classroom participation, classroom setting,</p> <p>14 PowerPoint presentation, handouts, class participation,</p> <p>15 training scenarios.</p> <p>16 Q. I'm sorry if I asked you this question already</p> <p>17 with respect to this, but is it man- -- it's mandatory for</p> <p>18 everyone in HFD?</p> <p>19 A. Yes, that was also mandatory training.</p> <p>20 Q. How is a -- An employee's participation in this</p> <p>21 training, is it tracked?</p> <p>22 A. It is tracked.</p> <p>23 Q. How is it tracked?</p> <p>24 A. It's actually twofold. On the HR side, we</p> <p>25 gather the -- an acknowledgment form, here again, with the</p>	<p>Page 56</p> <p>1 remember that?</p> <p>2 A. Yes.</p> <p>3 Q. What is EO 1-50?</p> <p>4 A. That's the Mayor's policy on workplace</p> <p>5 discrimination, retaliation, sexual harassment.</p> <p>6 Q. When was that put into effect?</p> <p>7 A. I believe 20- -- I'm sorry. Which question are</p> <p>8 you -- What was --</p> <p>9 Q. I'm sorry. When was EO 1-50 put into effect?</p> <p>10 A. I think that was 2010.</p> <p>11 Q. Okay.</p> <p>12 A. Mayor Annise Parker.</p> <p>13 Q. Okay. And training on -- I believe you said</p> <p>14 training on EO 1-50 is administered to cadets. Is that</p> <p>15 correct?</p> <p>16 A. Yes, it is.</p> <p>17 Q. How long has it been administered to cadets?</p> <p>18 A. I can tell you when I started participating. I</p> <p>19 started participating probably in 2013.</p> <p>20 MR. CAPODICE: Objection. Nonresponsive.</p> <p>21 Q. (BY MR. RUIZ) Do you know if it was</p> <p>22 administered to -- if training on EO 1-50 was administered</p> <p>23 to the cadets prior to 2013?</p> <p>24 A. Not to my knowledge.</p> <p>25 MR. CAPODICE: Objection. Nonresponsive.</p>

<p style="text-align: right;">Page 57</p> <p>1 MS. SULLIVAN: I'm going to also object as</p> <p>2 it being outside the scope of the 30(b)(6) designation.</p> <p>3 Q. (BY MR. RUIZ) We were talking about the</p> <p>4 Houston -- the assessment, and I asked you what training</p> <p>5 was provided in response to the assessment. Is that</p> <p>6 correct?</p> <p>7 A. Yes.</p> <p>8 Q. And you stated that the training with respect to</p> <p>9 the assessment's ongoing, but it's been modified over the</p> <p>10 years. Right?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And you have described the training on</p> <p>13 EO 1-50 as one of the modifications. Is that correct?</p> <p>14 MS. SULLIVAN: You can go ahead and answer</p> <p>15 it.</p> <p>16 A. A modification?</p> <p>17 Q. (BY MR. RUIZ) Or it's just evolved. It's</p> <p>18 changed over the years, the training that's been provided?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. So is this one of the different formats</p> <p>21 that you have testified as the training -- Excuse me.</p> <p>22 Is it your testimony that the EO 1-50</p> <p>23 training that's administered to cadets is a response to</p> <p>24 the Houston assessment?</p> <p>25 MS. SULLIVAN: Objection. Vague as to</p>	<p style="text-align: right;">Page 59</p> <p>1 A. That is correct.</p> <p>2 Q. Do you know specifically what her title is?</p> <p>3 A. I think she was promoted to a division manager</p> <p>4 position. I couldn't tell you how long ago.</p> <p>5 Q. Do you know who Matthew Russell is?</p> <p>6 A. Yes.</p> <p>7 Q. Who is Matthew Russell?</p> <p>8 A. Matthew Russell also reported to Kelly Shreck,</p> <p>9 as one of her trainers.</p> <p>10 Q. And Mr. Padilla, I believe you testified that he</p> <p>11 was also one of the trainers below Ms. Shreck?</p> <p>12 A. Yes.</p> <p>13 Q. Ms. Andrews, I'm going to turn now to topic</p> <p>14 4(f). Okay. 4(f), if you look at Exhibit 2, 4(f) is on</p> <p>15 Page 19 of 21.</p> <p>16 A. Okay.</p> <p>17 Q. Okay. And topic 4(f) is Defendant's efforts to</p> <p>18 implement the recommendations identified in the Assessment</p> <p>19 HOU2259 through 2318, which is Exhibit 13. Okay?</p> <p>20 A. Okay.</p> <p>21 Q. I want you to turn to -- in doc- -- in</p> <p>22 Exhibit 13, I want you to turn to HOU0002261.</p> <p>23 A. (Witness complies).</p> <p>24 Q. Now, do you see in that assessment on that page,</p> <p>25 there is a, in bold, top of the page, is "Key</p>
<p style="text-align: right;">Page 58</p> <p>1 time.</p> <p>2 You can go ahead and answer.</p> <p>3 A. I can't say it's specifically tied to this</p> <p>4 assessment.</p> <p>5 Q. (BY MR. RUIZ) You can't say whether it was done</p> <p>6 in response to the Houston assessment?</p> <p>7 A. No, I cannot.</p> <p>8 Q. Okay. Thanks.</p> <p>9 The same question for the other two</p> <p>10 trainings that we have been discussing, the newly -- The</p> <p>11 newly-promoted officer training, was that in response to</p> <p>12 the -- to Exhibit 13?</p> <p>13 A. I don't know.</p> <p>14 Q. Okay. And do you know if the biannual training</p> <p>15 that you have -- we have discussed previously, was that</p> <p>16 done in response to Exhibit 13?</p> <p>17 A. I don't know that either.</p> <p>18 Q. Ms. Andrews, earlier, you mentioned a Ms. Shreck</p> <p>19 that works for the City HR. Is that right?</p> <p>20 A. Yes.</p> <p>21 Q. Do you know if she's still with the City's HR</p> <p>22 Department?</p> <p>23 A. She is, yes.</p> <p>24 Q. And I know that you mentioned that she held a</p> <p>25 management position. Is that correct?</p>	<p style="text-align: right;">Page 60</p> <p>1 Recommendations"?</p> <p>2 A. Yes.</p> <p>3 Q. I'm going to ask you about these different</p> <p>4 recommendations, okay, and I want to know what efforts the</p> <p>5 City took to implement the recommendations on this page</p> <p>6 and going through the next two pages. Okay.</p> <p>7 If you like, you can go ahead and take a</p> <p>8 moment to review the recommendations and we can continue</p> <p>9 when you're ready.</p> <p>10 (Witness reviewing document)</p> <p>11 Q. Ms. Andrews -- I'm sorry -- I didn't mean to</p> <p>12 disturb you while you were reading.</p> <p>13 The City's actually designated two persons</p> <p>14 for this, okay, yourself and Fire Marshal Michelle McLeod.</p> <p>15 So there may be some recommendations that you know of or</p> <p>16 that you understand what efforts the City has taken and</p> <p>17 there may be some that you don't, and for those, we can</p> <p>18 ask Fire Marshal Michelle McLeod.</p> <p>19 A. Okay.</p> <p>20 Q. And you just tell me which ones you're able to</p> <p>21 address and we'll cover those and we'll remain -- we'll</p> <p>22 leave the rest to Fire Marshal Michelle McLeod.</p> <p>23 A. Okay. I can address (d); I can attempt to</p> <p>24 address (a); (e). Those are the ones I feel comfortable</p> <p>25 addressing.</p>

<p>Page 61</p> <p>1 Q. Okay. Thank you. Okay.</p> <p>2 The Key Recommendations, we'll start with</p> <p>3 (a), okay, and (a) is Leadership Commitment. It's on</p> <p>4 Page HOU0002261, and it is: "City and HFD leaders must</p> <p>5 continue to build upon actions that demonstrate that</p> <p>6 harassment and discrimination will not be tolerated and</p> <p>7 that this commitment is a vital part of and not incidental</p> <p>8 to HFD's mission."</p> <p>9 Did I read that correctly?</p> <p>10 A. Yes.</p> <p>11 Q. Now, will you please describe the efforts that</p> <p>12 the City has taken to implement that recommendation?</p> <p>13 A. I think this would certainly be tied to the</p> <p>14 newly-promoted officers training as far as preparing new</p> <p>15 officers to move into a position of management. We have</p> <p>16 also done some training for Command Staff as well on</p> <p>17 leadership.</p> <p>18 MR. CAPODICE: Objection. Nonresponsive.</p> <p>19 Q. (BY MR. RUIZ) When you say you think it's the</p> <p>20 newly-promoted officer training, do you know if that</p> <p>21 newly-promoted officer training was initiated specifically</p> <p>22 in connection with this key recommendation?</p> <p>23 A. Do I know specifically, no.</p> <p>24 Q. And I have the same question for the training on</p> <p>25 the Command Staff.</p>	<p>Page 63</p> <p>1 McLeod.</p> <p>2 Q. Okay. Is that for all of these recommendations</p> <p>3 or letter (a)?</p> <p>4 A. For that one, improvement training, I can</p> <p>5 answer. Well, it depends on the question. I'll say that.</p> <p>6 Q. Okay.</p> <p>7 A. But that, I would leave to her, as well as the</p> <p>8 policies.</p> <p>9 Q. Okay.</p> <p>10 So for letter (a), Leadership Commitment,</p> <p>11 it's my understanding you can't describe what efforts were</p> <p>12 taken specifically, what specific efforts were taken by</p> <p>13 the City to implement the recommendation described in</p> <p>14 letter (a). Is that correct?</p> <p>15 A. Definitely, no.</p> <p>16 Q. But you do feel comfortable describing the</p> <p>17 efforts specifically taken by the City for letter (d). Is</p> <p>18 that correct?</p> <p>19 A. Yes.</p> <p>20 Q. What efforts were taken by the City to implement</p> <p>21 the recommendation in D, improve training?</p> <p>22 A. Well, here again, basically, what I have already</p> <p>23 discussed, which was the face-to-face training, which was</p> <p>24 conducted over a two-year period, on understanding your</p> <p>25 rights; also the biannual training, which we are</p>
<p>Page 62</p> <p>1 Do you know whether it was specifically</p> <p>2 initiated in response to this key recommendation letter</p> <p>3 (a)?</p> <p>4 A. Specifically, no.</p> <p>5 Q. Do you know any specific efforts that the City</p> <p>6 has taken to implement the Leadership Commitment</p> <p>7 recommendation in Exhibit 13?</p> <p>8 A. Would you ask me that one more time, please?</p> <p>9 Q. Do you know what efforts specifically were taken</p> <p>10 by the City in connection with the key recommendation</p> <p>11 described in letter (a)?</p> <p>12 A. You're asking me to be specific?</p> <p>13 Q. If you know specifically what efforts were taken</p> <p>14 by the City to implement the Leadership Commitment</p> <p>15 recommendation in Exhibit 13.</p> <p>16 A. I felt comfortable in stating the newly-promoted</p> <p>17 officers training. However, you asked me another question</p> <p>18 that gave me pause on that, so I'm not sure how to answer</p> <p>19 that.</p> <p>20 Q. I know that the City has implemented this</p> <p>21 newly-promoted officer training you described.</p> <p>22 What I want to know is if -- what actions</p> <p>23 were taken by the City specifically to implement the</p> <p>24 recommendations in this document?</p> <p>25 A. I feel more comfortable leaving that to Chief</p>	<p>Page 64</p> <p>1 continuing with today; the training of our cadets as they</p> <p>2 come in to the Fire Department. Complaints, I can't</p> <p>3 address that.</p> <p>4 Q. So, looking at letter D, those three that you</p> <p>5 mentioned, the new-officer training, cadet training and</p> <p>6 the biannual training, your understanding is those relate</p> <p>7 to D(1). Is that correct?</p> <p>8 A. D(1), D(2). D(3), I can't answer that.</p> <p>9 Q. With respect to the actions that you're</p> <p>10 describing that relate to D(1) and D(2), is it your</p> <p>11 understanding that those were taken specifically in</p> <p>12 response to the recommendation made here in the</p> <p>13 assessment?</p> <p>14 A. Yes.</p> <p>15 Q. Ms. Andrews, do you -- Is it documented that the</p> <p>16 training that you're describing is in response to the</p> <p>17 assessment, Exhibit 13?</p> <p>18 A. I don't know if it's documented or not.</p> <p>19 Q. We'll move on to key recommendation (e), Provide</p> <p>20 Human Resources Support.</p> <p>21 A. I'm not comfortable answering that one, because</p> <p>22 it talks about employee complaint processes. I'm not</p> <p>23 involved in that.</p> <p>24 Q. Okay. All right. Okay.</p> <p>25 You didn't identify any other key</p>

<p>Page 65</p> <p>1 recommendations --</p> <p>2 A. No.</p> <p>3 Q. -- that you were able to provide testimony on.</p> <p>4 A. No.</p> <p>5 Q. Thank you very much.</p> <p>6 MR. RUIZ: Take a five-minute break.</p> <p>7 (Recess from 12:03:48 p.m. to 12:20:30</p> <p>8 p.m.)</p> <p>9 Q. (BY MR. RUIZ) Ms. Andrews, I want to turn to</p> <p>10 our final topic today. Okay. It's topic 5.</p> <p>11 You can find topic 5 on Page 20 of 21 on</p> <p>12 Exhibit 2. Topic 5 is HFD complaint policy, dissemination</p> <p>13 and training. Do you see that?</p> <p>14 A. Yes.</p> <p>15 Q. Topic 5 is broken down into two subtopics.</p> <p>16 Topic (a) is 8/1/2005 HOU2821 through 2826, Defendant's</p> <p>17 dissemination, training and implementation of this</p> <p>18 complaint policy, and then (b) is 8/1/2018 (HOU2831-2834,</p> <p>19 Defendant's dissemination, training and implementation of</p> <p>20 this complaint policy.</p> <p>21 Do you see where I have read from?</p> <p>22 A. I do.</p> <p>23 Q. Okay. Now, the City has designated you to</p> <p>24 respond to this topic with respect to training only.</p> <p>25 Okay?</p>	<p>Page 67</p> <p>1 A. I am familiar with it, yes.</p> <p>2 Q. How are you familiar with this one, Ms. Andrews?</p> <p>3 A. This was one of the handouts we used in our</p> <p>4 newly-promoted officers training.</p> <p>5 Q. Are you familiar with it otherwise?</p> <p>6 A. No.</p> <p>7 Q. No. Okay.</p> <p>8 Now, the Exhibit 11 is dated August of 1,</p> <p>9 2005. Do you see that?</p> <p>10 A. I do.</p> <p>11 Q. When you say that it is one of the documents</p> <p>12 that's been handed out to newly-promoted officer --</p> <p>13 newly-promoted officer training, are you saying that there</p> <p>14 is a complaint policy that's addressed for that specific</p> <p>15 one that's dated that date that's handed out at that</p> <p>16 training?</p> <p>17 MS. SULLIVAN: Objection. Confusing.</p> <p>18 Go ahead and answer it.</p> <p>19 A. I -- Do you --</p> <p>20 Q. (BY MR. RUIZ) Okay. Let me rephrase it.</p> <p>21 That specific Exhibit 11 has a date on</p> <p>22 it --</p> <p>23 A. Uh-hm.</p> <p>24 Q. -- August 1, 2005.</p> <p>25 Are you sure the one that's -- that you're</p>
<p>Page 66</p> <p>1 A. Okay.</p> <p>2 Q. The topic's about dissemination and training,</p> <p>3 but the topic that you have been designated by the City to</p> <p>4 talk to -- testify about is just about training. Okay?</p> <p>5 THE WITNESS: I have a question for</p> <p>6 clarification. Can I ask that?</p> <p>7 MS. SULLIVAN: Well, let him have a</p> <p>8 question --</p> <p>9 THE WITNESS: Okay.</p> <p>10 MS. SULLIVAN: -- and then if you need to</p> <p>11 clarify based on his question, do that.</p> <p>12 THE WITNESS: Okay.</p> <p>13 MR. RUIZ: Thanks.</p> <p>14 Q. (BY MR. RUIZ) I'm going to hand you what was</p> <p>15 marked yesterday as Exhibit 11. Okay.</p> <p>16 Exhibit 11 is Bates stamped HOU00002821 and</p> <p>17 it runs through HOU00002826. It's dated -- Houston Fire</p> <p>18 Department, Subject Complaint, and -- Well, it's titled</p> <p>19 that, and it's dated 8-1-05 at the bottom.</p> <p>20 Would you please take a moment to review</p> <p>21 that document, and I'm going to ask you questions about</p> <p>22 it.</p> <p>23 (Witness reviewing document)</p> <p>24 A. Okay.</p> <p>25 Q. (BY MR. RUIZ) Are you familiar with Exhibit 11?</p>	<p>Page 68</p> <p>1 saying is handed out at the newly-promoted officer</p> <p>2 training, is that -- has that name?</p> <p>3 A. No, I'm not sure of that.</p> <p>4 Q. So it just may be a complaint policy?</p> <p>5 A. Right.</p> <p>6 Q. But not necessarily that version?</p> <p>7 A. Not necessarily this version.</p> <p>8 Q. I'm going to ask you questions about this</p> <p>9 version. Okay?</p> <p>10 I know that there are -- Well, let me back</p> <p>11 up. I'm going to hand you what is Exhibit 12. Okay?</p> <p>12 Exhibit 12 is titled Houston Fire Department, Subject</p> <p>13 Complaints, okay, and at the bottom of that, it's dated</p> <p>14 August 1, 2018.</p> <p>15 Would you please take a moment to review</p> <p>16 that?</p> <p>17 (Witness reviewing document)</p> <p>18 A. Okay.</p> <p>19 Q. (BY MR. RUIZ) Okay. I'm going to ask you some</p> <p>20 questions, but these questions are specifically about</p> <p>21 Exhibit 11, the complaint policy that is dated August 1,</p> <p>22 2005. Okay?</p> <p>23 A. Okay.</p> <p>24 Q. All right.</p> <p>25 Now, when that complaint policy -- or let</p>

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1 me ask you this: What training has the City provided to
 2 Houston Fire Department employees with respect to
 3 Exhibit 11?
 4 **A. I can't respond to that. I don't know of any**
 5 **training specifically regarding this exhibit.**
 6 Q. Exhibit 11?
 7 **A. Exhibit 11.**
 8 Q. Do you -- do you know when Exhibit 11 remained
 9 in effect through?
 10 **A. (No audible response).**
 11 Q. The complaint policy, Exhibit 11, do you know
 12 when it remained and effected through?
 13 **A. No, I can't answer that.**
 14 Q. Okay.
 15 Do you know if training had ever been --
 16 And we're sticking with Exhibit 11. Okay?
 17 **A. Okay.**
 18 Q. Do you know if training on that complaint policy
 19 had ever been developed but not administered to Houston
 20 Fire Department employees?
 21 **A. Do I know that?**
 22 Q. Yes, ma'am.
 23 **A. No.**
 24 Q. Okay.
 25 Do you know if training, training on

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1 Exhibit 11, the complaint policy, was ever planned and
 2 not -- or planned to be delivered to Houston Fire
 3 Department employees and not delivered?
 4 **A. No.**
 5 Q. Now, Ms. Andrews, I want to make sure I
 6 understand your answers and what you know and what you
 7 don't know, or what you can testify to.
 8 Has training ever been conducted on
 9 Exhibit 11? Has training ever been conducted for Houston
 10 Fire Department sworn personnel on Exhibit 11?
 11 **A. If I'm understanding what you're asking me, are**
 12 **you asking me if training has specifically been put into**
 13 **place for this particular exhibit?**
 14 Q. Correct.
 15 For Exhibit 11, I want to know if training
 16 was ever conducted specifically on that, the complaint
 17 policy described in Exhibit 11.
 18 **A. As it -- I can answer that as it relates to**
 19 **other training.**
 20 Q. Okay. Did the other training specifically cover
 21 the complaint policy that is Exhibit 11?
 22 **A. Yes.**
 23 Q. It did. Okay.
 24 When did that training occur?
 25 **A. This is a part of our newly-promoted officers**

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1 training package. So that would have started, as I stated
2 earlier, in 2013 or '14.
 3 Q. Okay. Now, I want to make sure that we're
 4 absolutely clear. Okay.
 5 This Exhibit 11 is dated August 1st, 2005
 6 and it's different from the one dated August 1, 2018.
 7 **A. I see that.**
 8 Q. So you're certain that the complaint policy
 9 dated August 1, 2005 was part of the newly-promoted
 10 officer training?
 11 **A. To the best of my ability, yes.**
 12 Q. Do you know if it was -- Other than the
 13 newly-promoted officer training, was it ever a part of any
 14 other training before the newly-promoted officer training?
 15 **A. I don't know that.**
 16 Q. The date on this policy is August 1st, 2005, and
 17 I'm referring to Exhibit 11.
 18 **A. Okay.**
 19 Q. Was training provided on this, on this policy in
 20 2005, when it was put into effect?
 21 **A. I don't know that.**
 22 Q. Do you know if it was -- if training on this
 23 policy was put into effect any time between 2005 and 2010?
 24 **A. I don't know that either.**
 25 Q. Okay. Do you know if any training on this

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1 policy was put into place between 2010 and 2012?
 2 **A. I don't know that.**
 3 Q. And do you know if any training on Exhibit 11
 4 was put into place between August 12 -- or 2012 and 2015?
 5 **A. Again, that goes back to my recollection of it**
 6 **being used in the newly-promoted officers training.**
 7 Q. Which I believe you -- your recollection is it
 8 started maybe around 2013?
 9 **A. Yes.**
 10 Q. Okay. Thank you.
 11 Have you made any efforts to determine when
 12 training on this particular exhibit had been administered?
 13 **A. No.**
 14 Q. You testified that it has -- Exhibit 11 has been
 15 a part of the newly-promoted officer training, and I
 16 believe it's at least sometime in 2013. Is that correct?
 17 **A. Yes.**
 18 Q. What type of training -- What are persons --
 19 What have persons been trained with respect to -- or for
 20 that new promoted -- newly-promoted officer training, what
 21 were they trained on with respect to Exhibit 11?
 22 **A. This particular exhibit was trained on by Chief**
 23 **McLeod. This was her area of expertise, so she was the**
 24 **one who would take them through this particular process,**
 25 **this particular policy.**

<p style="text-align: right;">Page 73</p> <p>1 Q. Do you know what Chief McLeod would cover with</p> <p>2 respect to this policy?</p> <p>3 A. I can't speak for her specifically, no.</p> <p>4 Q. Now, I want to switch to subtopic 5(b), which is</p> <p>5 Defendant's dissemination, training and implementation of</p> <p>6 this complaint policy, which is Exhibit 12. Okay?</p> <p>7 A. Okay.</p> <p>8 Q. Exhibit 12 is also titled Houston Fire</p> <p>9 Department, Subject Complaints, and it just has a</p> <p>10 different date --</p> <p>11 A. Right.</p> <p>12 Q. -- at the bottom, August 1st, 2018. Do you see</p> <p>13 that on Exhibit 12?</p> <p>14 A. I do, yes.</p> <p>15 Q. Are you familiar with this exhibit?</p> <p>16 A. No, I'm not.</p> <p>17 Q. Okay.</p> <p>18 Has training been provided by the Houston</p> <p>19 Fire Department or the City to the Houston Fire Department</p> <p>20 personnel on or with respect to Exhibit 12?</p> <p>21 A. I don't know.</p> <p>22 Q. Do you know if training on Exhibit 12 has ever</p> <p>23 been planned by the Houston Fire Department?</p> <p>24 A. Has ever been planned? I don't know that</p> <p>25 either.</p>	<p style="text-align: right;">Page 75</p> <p>1 MR. RUIZ: Somebody else gets a chance to</p> <p>2 ask a few follow-ups.</p> <p>3 THE WITNESS: Oh, God. Okay.</p> <p>4 EXAMINATION</p> <p>5 BY MR. CAPODICE:</p> <p>6 Q. Hi, Ms. Andrews.</p> <p>7 A. Hello.</p> <p>8 Q. My name is Dwain Capodice. I represent</p> <p>9 Ms. Draycott and Ms. Keyes in this matter. I just have a</p> <p>10 couple of follow-up questions I want to make sure that</p> <p>11 we're on the same wavelength on.</p> <p>12 Earlier, you were asked the documents that</p> <p>13 you had reviewed to prepare for your deposition. Do you</p> <p>14 recall that question?</p> <p>15 A. Yes.</p> <p>16 Q. One of the things that you said you reviewed is</p> <p>17 something that had questions for consideration, is what</p> <p>18 you said, and I'm just kind of curious, like, what you saw</p> <p>19 that was, like, questions for consideration.</p> <p>20 A. It was something similar to this (indicating).</p> <p>21 Q. Was it that exact document or were there</p> <p>22 questions that were created that you may have to answer at</p> <p>23 the deposition?</p> <p>24 A. It was this document (indicating).</p> <p>25 Q. Okay.</p>
<p style="text-align: right;">Page 74</p> <p>1 Q. For Exhibit 11, which is the complaint policy</p> <p>2 dated August 1st, 2005, you identified Chief McLeod as the</p> <p>3 person who would have expertise in that complaint policy.</p> <p>4 A. Yes --</p> <p>5 Q. Is that correct?</p> <p>6 A. -- that is correct.</p> <p>7 Q. To your understanding, would that be the same</p> <p>8 for Exhibit 12?</p> <p>9 A. Actually, I think Exhibit -- Exhibit 12 is now</p> <p>10 under Chief Alfredo Martinez. He would probably be the</p> <p>11 Chief to address that one, that Exhibit 12.</p> <p>12 Q. Okay.</p> <p>13 And the Chief -- And the City has</p> <p>14 identified Mr. Alfredo, or Chief Alfredo Martinez, with</p> <p>15 respect to dissemination, but identified you with respect</p> <p>16 to being able to testify about training on -- on</p> <p>17 Exhibit 12.</p> <p>18 Are you -- Have you made any efforts to</p> <p>19 find out what training has been administered with respect</p> <p>20 to Exhibit 12?</p> <p>21 A. No.</p> <p>22 MR. RUIZ: Ms. Andrews, for now, those are</p> <p>23 the questions that I have. Thank you very much for</p> <p>24 answering them. Okay?</p> <p>25 THE WITNESS: Okay. Thank you.</p>	<p style="text-align: right;">Page 76</p> <p>1 Did you talk to Ms. Shreck at all in</p> <p>2 advance of this deposition?</p> <p>3 A. No.</p> <p>4 Q. Why not?</p> <p>5 A. Why would I?</p> <p>6 Q. Do you think she would have had information as</p> <p>7 to the training that was conducted by this Fire Department</p> <p>8 in response to any of the questions that you were asked</p> <p>9 today that would have helped answer any of these</p> <p>10 questions?</p> <p>11 A. I wasn't responsible for gathering that</p> <p>12 information.</p> <p>13 Q. What role did Ms. Shreck have back in 2009-2010,</p> <p>14 if you know?</p> <p>15 A. Again, Ms. Shreck's area was responsible for</p> <p>16 creating the training document and implementing it and</p> <p>17 then her staff also assisted in carrying out that</p> <p>18 implementation.</p> <p>19 Q. And that's your current role, correct, or do I</p> <p>20 have that wrong?</p> <p>21 A. I'm sorry. What?</p> <p>22 Q. Is that your current role with HR and the City?</p> <p>23 A. My current role?</p> <p>24 Q. Did you replace Ms. Shreck?</p> <p>25 A. No.</p>

<p style="text-align: right;">Page 77</p> <p>1 Q. Okay.</p> <p>2 A. We're in two different departments.</p> <p>3 Q. Okay.</p> <p>4 So Ms. Shreck created the training</p> <p>5 materials that were used by your department to train</p> <p>6 firefighters?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. You didn't think there was any</p> <p>9 information that she might have as to the training that</p> <p>10 was conducted in response to the assessment, asking her in</p> <p>11 particular whether she created any materials in response</p> <p>12 to the assessment?</p> <p>13 MS. SULLIVAN: Objection. That misstates</p> <p>14 the facts and evidence and the testimony of this witness.</p> <p>15 You can go ahead and answer.</p> <p>16 A. I'm not following your question.</p> <p>17 Q. (BY MR. CAPODICE) Sure.</p> <p>18 Obviously, you weren't tasked with creating</p> <p>19 training materials after the assessment. Correct?</p> <p>20 A. Right.</p> <p>21 Q. Ms. Shreck was?</p> <p>22 A. Yes.</p> <p>23 Q. And so in terms of figuring out which materials</p> <p>24 were created in response to the assessment --</p> <p>25 MS. SULLIVAN: Thompson Horton assessment.</p>	<p style="text-align: right;">Page 79</p> <p>1 Q. Would they -- I mean, why -- Would they have</p> <p>2 information in response to anything today, that you're</p> <p>3 aware of?</p> <p>4 A. They are both deceased.</p> <p>5 Q. But Ms. Shreck would know what information they</p> <p>6 would have, correct, as her manager?</p> <p>7 I mean, she's the one that would have</p> <p>8 tasked them with doing things?</p> <p>9 MS. SULLIVAN: Objection. Calls for</p> <p>10 speculation.</p> <p>11 A. Here again, I can't speak for Ms. Shreck.</p> <p>12 Q. (BY MR. CAPODICE) Okay.</p> <p>13 With regard to the training that was done</p> <p>14 in response to any of these investigations, let me ask</p> <p>15 you, just generally, have you ever seen training being</p> <p>16 ordered in response to an OIG investigation?</p> <p>17 A. I have never been privy to that, no.</p> <p>18 Q. And, obviously, in your role, would you track</p> <p>19 any training that would be responsive to a particular</p> <p>20 investigation?</p> <p>21 Like, is there a way in your system to</p> <p>22 track, you know, general training, annual/biannual</p> <p>23 training, versus OIG-specific in response to an</p> <p>24 investigation training?</p> <p>25 MS. SULLIVAN: Objection. Compound.</p>
<p style="text-align: right;">Page 78</p> <p>1 MR. CAPODICE: Right.</p> <p>2 Q. (BY MR. CAPODICE) You know what I'm saying when</p> <p>3 I say "assessment". Don't you?</p> <p>4 A. Well, I'm --</p> <p>5 Q. The Exhibit 13 that we looked at earlier, I</p> <p>6 think is the correct number.</p> <p>7 A. Yes.</p> <p>8 Q. And when answering questions about what training</p> <p>9 was done in response to that assessment, you don't think</p> <p>10 Ms. Shreck would have had any knowledge about that?</p> <p>11 A. I can't speak for Ms. Shreck.</p> <p>12 Q. I guess she would be the person that the City</p> <p>13 would have been tasked with creating training materials in</p> <p>14 response to that assessment, from your understanding?</p> <p>15 MS. SULLIVAN: Objection.</p> <p>16 Misstates the facts and the evidence and</p> <p>17 the testimony of this witness.</p> <p>18 A. Again, I can't speak for Ms. Shreck.</p> <p>19 Q. (BY MR. CAPODICE) Okay. And then I guess,</p> <p>20 obviously, we talked about Mr. Padilla, and who was the</p> <p>21 other person that was the trainers? What was the other</p> <p>22 person's name?</p> <p>23 A. The person was --</p> <p>24 Q. Russell?</p> <p>25 A. -- Matt, Matt Russell.</p>	<p style="text-align: right;">Page 80</p> <p>1 Go ahead and answer.</p> <p>2 A. I am not responsible for that.</p> <p>3 Q. (BY MR. CAPODICE) Okay. You have reviewed</p> <p>4 training records for individual employees. Correct?</p> <p>5 A. Have I done what, again?</p> <p>6 Q. In your job, you have reviewed training records</p> <p>7 for individual employees?</p> <p>8 A. Training records in regard to --</p> <p>9 Q. In regard to HR training.</p> <p>10 A. Are you saying compiling information?</p> <p>11 Q. No. I'm asking -- You're aware that the City</p> <p>12 tracks the training that they provide employees. Correct?</p> <p>13 A. Yes.</p> <p>14 Q. And, in that, they try to track the courses that</p> <p>15 they take, including some of the courses that you talked</p> <p>16 about today, the biannual training and the face-to-face</p> <p>17 training and things of that nature. Correct?</p> <p>18 A. Yes.</p> <p>19 Q. And they keep an individual record for each</p> <p>20 employee of the training that they have taken?</p> <p>21 A. Yes.</p> <p>22 Q. Okay.</p> <p>23 Is there any way of tracking in those</p> <p>24 personnel training records any training that was a</p> <p>25 response to an investigation?</p>

<p style="text-align: right;">Page 81</p> <p>1 A. Not to my knowledge.</p> <p>2 Q. Okay.</p> <p>3 And then you also talked a little bit about</p> <p>4 ARFF, Station 54, not requesting any training specifically</p> <p>5 that you're aware of.</p> <p>6 Were you aware of ARFF ever requesting --</p> <p>7 That these stations can request particular training. Were</p> <p>8 you ever aware of either Station 54 or ARFF requesting any</p> <p>9 training directly?</p> <p>10 MS. SULLIVAN: Objection. Compound and</p> <p>11 misstates the testimony, but go ahead and answer.</p> <p>12 A. Ask me --</p> <p>13 Q. (BY MR. CAPODICE) I know it was a pretty</p> <p>14 confusing question. Let me try to clear it up.</p> <p>15 A. Yes.</p> <p>16 Q. You testified a little bit earlier about you</p> <p>17 performing training at a particular station if it was</p> <p>18 requested.</p> <p>19 A. Yes.</p> <p>20 Q. Are you aware of Station 54 ever requesting</p> <p>21 particular training?</p> <p>22 A. Yes.</p> <p>23 Q. When?</p> <p>24 A. God, 2000- -- sitting on my board. This is</p> <p>25 speculation. I -- I think in 2012 --</p>	<p style="text-align: right;">Page 83</p> <p>1 MR. CAPODICE: Let me take a quick break</p> <p>2 and make sure that there is not anything else that we need</p> <p>3 to go over.</p> <p>4 (Recess from 12:46:23 p.m. to 12:48:57</p> <p>5 p.m.)</p> <p>6 MR. CAPODICE: I'll pass the witness,</p> <p>7 subject to receiving the materials that Deidra said she's</p> <p>8 going to make sure and confirm with regard to the</p> <p>9 memorandum that we talked about earlier and any other</p> <p>10 materials reviewed for the deposition.</p> <p>11 MS. SULLIVAN: Okay. I just have a few</p> <p>12 follow-up questions.</p> <p>13 EXAMINATION</p> <p>14 BY MS. SULLIVAN:</p> <p>15 Q. You were asked specifically as it relates to</p> <p>16 training following the release of the findings and</p> <p>17 investigative synopses for three investigations.</p> <p>18 Do you recall that?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Prior to the release of those, the</p> <p>21 investigative findings and synopses, was -- was there</p> <p>22 training on EEO-related topics?</p> <p>23 A. Yes.</p> <p>24 Q. And, to your knowledge, was any training done</p> <p>25 specifically because of the three OIG investigations?</p>
<p style="text-align: right;">Page 82</p> <p>1 Q. Okay.</p> <p>2 A. -- 2013, somewhere in there.</p> <p>3 Q. And do you recall what training you requested?</p> <p>4 A. We went out for review on the Executive Order</p> <p>5 1-50 training.</p> <p>6 Q. Okay. So they asked for additional follow-up on</p> <p>7 1-50?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. What about ARFF? Any specific training</p> <p>10 requested in any one -- any of the stations in ARFF?</p> <p>11 A. Yes, we did the same thing there.</p> <p>12 Q. And I guess, just so I'm clear, you know, that</p> <p>13 was one of the things that you did after 1-50 was</p> <p>14 implemented, right?</p> <p>15 You made sure you went to the each of the</p> <p>16 stations and had training on it. Correct?</p> <p>17 A. Actually, the 1-50 training was online.</p> <p>18 Q. Okay.</p> <p>19 A. But if we were requested to go to a station to</p> <p>20 address an issue or do a refresh, then we would do that.</p> <p>21 Q. Were there any particular issues or -- that they</p> <p>22 were having at these stations that needed follow-up?</p> <p>23 A. It could be anything, from issues between</p> <p>24 employees.</p> <p>25 Q. All right.</p>	<p style="text-align: right;">Page 84</p> <p>1 A. No.</p> <p>2 Q. Okay. And, again, just to clarify, you were</p> <p>3 asked questions about training specific to Station 54.</p> <p>4 Do you recall that?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And it was in conjunction with the three</p> <p>7 OIG investigations that we have talked about.</p> <p>8 Do you recall that?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Now, is it your testimony that the</p> <p>11 individuals at 54 received training but not specific to</p> <p>12 those investigations?</p> <p>13 MR. RUIZ: Objection. Leading.</p> <p>14 A. Yes.</p> <p>15 MR. CAPODICE: I'm going to object to the</p> <p>16 extent it calls for speculation, no personal knowledge of</p> <p>17 the training that was done.</p> <p>18 MS. SULLIVAN: Okay.</p> <p>19 Q. (BY MS. SULLIVAN) After the release of the</p> <p>20 Thompson Horton assessment, if a complaint came back that</p> <p>21 was not sustained, or even if it was sustained, do you</p> <p>22 recall having to provide any training to the parties to</p> <p>23 that investigation?</p> <p>24 A. Yes.</p> <p>25 Q. When did you start doing that?</p>

<p style="text-align: right;">Page 85</p> <p>1 A. That was under Chief McLeod, possibly 2012.</p> <p>2 Q. And what was the nature of that training?</p> <p>3 A. Basically, to -- before the individual was</p> <p>4 returned to the station, to make sure that they were aware</p> <p>5 of the executive orders that related to any type of</p> <p>6 disciplinary actions.</p> <p>7 Q. Now, I'm not sure if this was exactly clear.</p> <p>8 We were talking about the newly-promoted</p> <p>9 officer training. Do you recall that?</p> <p>10 A. Yes.</p> <p>11 Q. Okay.</p> <p>12 Did the newly-promoted officer training</p> <p>13 cover other topics besides EEO-related matters?</p> <p>14 A. Yes.</p> <p>15 Q. Is it your recollection -- Is it your</p> <p>16 understanding that it covered topics such as operations?</p> <p>17 A. Yes.</p> <p>18 Q. Now, you were informed at the beginning of this</p> <p>19 deposition, and prior to, that you would be testifying to</p> <p>20 specific topics. Do you recall that?</p> <p>21 A. Yes.</p> <p>22 Q. Okay.</p> <p>23 You are not here to testify about EEO</p> <p>24 training that occurred prior to the Thompson Horton</p> <p>25 assessment. Is that correct?</p>	<p style="text-align: right;">Page 87</p> <p>1 the Thompson Horton assessment.</p> <p>2 Ms. Sullivan asked you questions about</p> <p>3 training that occurs when a complaint comes back as either</p> <p>4 sustained or not sustained. Do you remember that, a</p> <p>5 couple of those questions?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And it sounded like training was, like,</p> <p>8 provided to an individual but I did not hear, or I don't</p> <p>9 think you identified what individuals training was</p> <p>10 provided to. Okay.</p> <p>11 And I believe you testified that before a</p> <p>12 person was allowed -- an individual was allowed to return</p> <p>13 to work, they had to go through training. Correct?</p> <p>14 A. Well, let me be clear. To the station. I don't</p> <p>15 want to say work per se.</p> <p>16 Q. Okay. When a complaint comes back as not</p> <p>17 sustained, is there some type of training that's now</p> <p>18 provided?</p> <p>19 A. Under Chief McLeod, if there was a situation</p> <p>20 where she felt the individual needed a refresh on</p> <p>21 Executive Order 1-50, I would sit with that particular</p> <p>22 person and go over that particular policy.</p> <p>23 Q. Okay. Is -- is there a written policy regarding</p> <p>24 this process?</p> <p>25 A. That's on Staff Services side. I can't answer</p>
<p style="text-align: right;">Page 86</p> <p>1 A. Yes.</p> <p>2 MR. RUIZ: Objection. Leading.</p> <p>3 Q. (BY MS. SULLIVAN) Now, I recall your testimony</p> <p>4 that the EEO Rights and Responsibilities training that</p> <p>5 began in early 2010 initially was developed by Kelly</p> <p>6 Shreck. Is that correct?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. After the training with regard to EEO</p> <p>9 Rights and Responsibilities, did you develop training</p> <p>10 related to EEO issues?</p> <p>11 A. Yes.</p> <p>12 Q. Now, in the newly-promoted officer training,</p> <p>13 your topic was EEO-related issues. Is that fair to say?</p> <p>14 A. Yes, it is.</p> <p>15 Q. And did you present with somebody else?</p> <p>16 A. I did.</p> <p>17 Q. And who was that?</p> <p>18 A. That would have been Chief Michelle McLeod.</p> <p>19 Q. So you were present at the time that she did</p> <p>20 her -- her component of the training?</p> <p>21 A. Yes.</p> <p>22 MS. SULLIVAN: Okay. Pass the witness.</p> <p>23 FURTHER EXAMINATION</p> <p>24 BY MR. RUIZ:</p> <p>25 Q. I want to ask you some questions that relate to</p>	<p style="text-align: right;">Page 88</p> <p>1 definitively.</p> <p>2 Q. How is it that you learned that Chief McLeod</p> <p>3 wants you to provide training to a particular individual</p> <p>4 in response to a sustained or not sustained OIG finding?</p> <p>5 A. I would usually be brought in, given the folder</p> <p>6 on what's -- what was discussed, what the issues were and</p> <p>7 what the findings were at that point, and tailor the</p> <p>8 training to address those particular issues, so I was</p> <p>9 given that information by Staff Services.</p> <p>10 Q. So Staff Services, let me -- I'm -- I want to</p> <p>11 make sure I really understand this process. Okay.</p> <p>12 So Staff Services brings you in when it</p> <p>13 believes that training is necessary with respect to a</p> <p>14 particular OIG investigation. Is that correct?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And when they bring you in, what is it</p> <p>17 that they tell you?</p> <p>18 A. Basically, I have an opportunity to review</p> <p>19 whatever is in the folder --</p> <p>20 Q. Okay.</p> <p>21 A. -- the information, and then make a</p> <p>22 determination as to what it is we need to talk about in</p> <p>23 regard to Executive Order 1-50.</p> <p>24 Q. So they present you with a folder and you're</p> <p>25 asked to review the folder, and is it you that makes the</p>

<p>Page 89</p> <p>1 determination whether or not training or refresher 2 training is -- is required or appropriate? 3 A. No. Usually, if I receive a folder, it's 4 already been determined by someone in Staff Services that 5 the training is now required or being requested. 6 Q. Okay. So you -- Staff Services is making a 7 determination that training is not required? 8 A. Required or not required. 9 Q. Oh, required or not required? 10 A. Yes. 11 Q. Okay. So do you -- do you receive folders where 12 the -- where Staff Services has already determined that 13 training is not required? 14 A. No. 15 Q. No. You only receive those folders where Staff 16 Services has determined that training is required? 17 A. Yes. 18 Q. Now, in those situations -- Well, let's cover 19 the not-required situations. 20 Do you know who makes the determinations in 21 Staff Services, who makes the determination that training 22 is not required with respect to an OIG investigation? 23 A. I guess I would have to go back to the Chiefs, 24 whichever Chief is in -- over that area. 25 Q. Do you know who makes the determination either</p>	<p>Page 91</p> <p>1 Q. Okay. Do you know who that particular person 2 is? 3 A. No. 4 Q. Okay. Do you know if it's a particular group 5 within Staff Services? 6 A. No. 7 Q. No. Okay. 8 Have they -- Has that group met with you to 9 come up with a method of determining whether or not 10 training is needed? 11 A. No. 12 Q. Okay. So is it that you only receive files that 13 some group or person within Staff Services has determined 14 a need for training? 15 A. Yes. 16 Q. Okay. 17 If that group or person within Staff 18 Services has not determined a need for training, do you 19 ever see that file? 20 A. No. 21 Q. Okay. How long has that process been ongoing? 22 A. I think it started under Chief McLeod in 2012, 23 2013, somewhere in there. 24 Q. Okay. And when those files come to you and 25 there is a determination for a need for additional</p>
<p>Page 90</p> <p>1 way? 2 A. (No audible response). 3 Q. Do you know who in Staff Services makes the 4 determination either way, whether training is required or 5 not required with respect to the conclusion of the 6 investigation? 7 A. Here again, that would have come with me, from 8 Chief McLeod, her area, her group. 9 Q. I'm sorry, Ms. Andrews. I'm trying to 10 understand. 11 A. I think what you're asking me is, is she the 12 one? I can't tell you definitively that she is the only 13 one to make that determination. 14 Q. I think maybe that I don't understand whether or 15 not you're involved with the Staff Services determination 16 or not. 17 A. I'm not. 18 Q. You're not. Okay. 19 That file is sent to you by Staff Services. 20 Is that correct? 21 A. Yes. 22 Q. And, at that point, someone has already 23 determined -- somebody in Staff Services has already 24 determined whether training is needed. Is that right? 25 A. Yes.</p>	<p>Page 92</p> <p>1 training, is the need for additional training always 2 related to EEO 150, or do I have that number right? 3 A. You got it right. Yes. 4 Q. Is there ever a recommendation for training 5 other than EO 1-50 that comes to you? 6 A. That comes to me, no. 7 Q. For those -- those situations where there is a 8 determination that somebody should be trained, is it 9 generally who -- who would be offered the training? 10 A. Whichever member was involved in the process. 11 Q. Would that typically be the respondent in an OIG 12 investigation? 13 A. Oh, that's a good question. I don't know. 14 Q. You don't know. Okay. 15 It could be anybody involved -- 16 A. It could be, yes. 17 Q. I'm sorry. Let me finish my question. 18 It could be anybody involved in the 19 investigation? 20 A. Yes. 21 Q. Okay. Meaning either the person that complained 22 or the person they complained about? 23 A. Yes. 24 Q. Okay. 25 Have you ever seen a recommendation where</p>

<p style="text-align: right;">Page 93</p> <p>1 several persons were identified as probably appropriate</p> <p>2 persons to go through refresher training?</p> <p>3 MS. SULLIVAN: Objection. Vague.</p> <p>4 Go ahead and answer.</p> <p>5 Q. (BY MR. RUIZ) Is it -- Are there times where</p> <p>6 there's more than one person who Staff Services has</p> <p>7 determined should -- should be the subject of more</p> <p>8 training?</p> <p>9 A. We do have a policy, well, a practice in place</p> <p>10 of conflict resolution, where we bring two parties</p> <p>11 together to try to work out issues.</p> <p>12 Now, that may not necessarily be tied to an</p> <p>13 OIG investigation.</p> <p>14 Q. You know, I don't think my question's clear.</p> <p>15 Let me make sure.</p> <p>16 A. Okay.</p> <p>17 Q. In those situations where OIG -- I'm sorry --</p> <p>18 Staff Services has sent you a determination and that</p> <p>19 determination that there should be more training offered</p> <p>20 to in this situation, is there ever -- is it ever a</p> <p>21 situation where the individual that they think should be</p> <p>22 given more training is actually more than one individual,</p> <p>23 but a group of persons?</p> <p>24 A. I don't recall, no.</p> <p>25 Q. Okay.</p>	<p style="text-align: right;">Page 95</p> <p>1 testimony with respect to the training that has been</p> <p>2 administered on Exhibit 12. Is that correct?</p> <p>3 A. Yes.</p> <p>4 Q. Okay.</p> <p>5 You were identified as the person who could</p> <p>6 provide testimony, and I just want to get that on the</p> <p>7 record so that we can get the City to actually provide</p> <p>8 somebody that can provide answers to questions with</p> <p>9 relating -- relating to 12. Okay.</p> <p>10 MS. SULLIVAN: Okay.</p> <p>11 MR. MONTEIRO: It's 11, too.</p> <p>12 MR. RUIZ: To the extent that she was not</p> <p>13 able to answer questions with respect to 11 --</p> <p>14 MS. SULLIVAN: Okay.</p> <p>15 MR. RUIZ: -- is that okay? You --</p> <p>16 MS. SULLIVAN: Yeah.</p> <p>17 MR. RUIZ: -- agree to that? Okay.</p> <p>18 MR. MONTEIRO: Can we get that someone</p> <p>19 tomorrow or Thursday for that? I mean, we have McLeod</p> <p>20 scheduled already, so...</p> <p>21 MS. SULLIVAN: I'll -- I'll check on the</p> <p>22 2018 one, since this is the most recent one. So I'll</p> <p>23 check on that one.</p> <p>24 McLeod should be able to. If not, I'll</p> <p>25 make sure that she is, so...</p>
<p style="text-align: right;">Page 94</p> <p>1 And in those situations where OIG has</p> <p>2 determined that it's appropriate to provide more training,</p> <p>3 is it your practice, or your office practice, to always</p> <p>4 provide that training?</p> <p>5 MS. SULLIVAN: Objection. Misstates the</p> <p>6 facts and evidence and the testimony of this witness.</p> <p>7 Go ahead and answer.</p> <p>8 A. It's not OIG. Here again, it's Staff Services.</p> <p>9 Q. (BY MR. RUIZ) Oh, correct. Okay.</p> <p>10 When staff Services makes that</p> <p>11 recommendation that training was to be provided, is it</p> <p>12 always provided?</p> <p>13 A. If they make a recommendation, yes, it is.</p> <p>14 Q. It's always provided.</p> <p>15 And is training mandatory for the person</p> <p>16 identified before they return to work?</p> <p>17 A. I don't necessarily know if it's mandatory or</p> <p>18 not.</p> <p>19 Q. Do they -- Does the person that the Staff</p> <p>20 Services recommends for training, do they have to go to</p> <p>21 the training?</p> <p>22 A. I don't know that.</p> <p>23 Q. You don't know that. Okay. Oh, I'm sorry.</p> <p>24 Earlier, when we were talking about</p> <p>25 Exhibit 12, you testified that you could not provide</p>	<p style="text-align: right;">Page 96</p> <p>1 MR. RUIZ: Thank you very much.</p> <p>2 Ms. Andrews, those are the questions that I</p> <p>3 have. Thank you very much.</p> <p>4 THE WITNESS: Thank you.</p> <p>5 FURTHER EXAMINATION</p> <p>6 BY MR. CAPODICE:</p> <p>7 Q. Did you have all the information that you needed</p> <p>8 to answer all the questions today?</p> <p>9 A. Yes.</p> <p>10 MR. CAPODICE: Okay. I pass the witness.</p> <p>11 MS. SULLIVAN: I pass. We're done. Read</p> <p>12 and sign, please.</p> <p>13 (Deposition concluded at 01:04:58 p.m.)</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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1 CHANGES AND SIGNATURE	1 STATE OF TEXAS
2 ORAL DEPOSITION OF WANDA L. ANDREWS AUGUST 13, 2019	2 COUNTY OF HARRIS
3 PAGE LINE CHANGE REASON	3 I, JAMES M. PLAIR, a Certified Shorthand Reporter in
4 _____	4 and for the State of Texas, do hereby certify that,
5 _____	5 pursuant to the notice issued and the agreement
6 _____	6 hereinbefore set forth, there came before me on the _____
7 _____	7 day of _____, A. D., 2019, at 9:38 a.m.,
8 _____	8 at the offices of CITY OF HOUSTON LEGAL DEPARTMENT, 900
9 _____	9 Bagby, Third Floor, Houston, Texas 77002, the following
10 _____	10 named person, to-wit: WANDA L. ANDREWS, who was by me
11 _____	11 duly cautioned and sworn to testify the truth, the whole
12 _____	12 truth, and nothing but the truth of her knowledge touching
13 _____	13 and concerning the matters in controversy in this cause;
14 _____	14 and that she was thereupon carefully examined upon her
15 _____	15 oath and her examination reduced to typewriting under my
16 _____	16 supervision; that the deposition is a true record of the
17 _____	17 testimony given by the witness; that the witness has
18 _____	18 requested a review pursuant to Rule 30(e)(2), same to be
19 _____	19 sworn to, and subscribed, by said witness before any
20 _____	20 Notary Public, pursuant to the agreement of the parties.
21 _____	21 I further certify that I am neither attorney nor
22 _____	22 counsel for, nor related to or employed by, any of the
23 _____	23 parties to the action in which this deposition is taken;
24 _____	24 and further that I am not a relative or employee of any
25 _____	25 attorney or counsel employed by the parties hereto, or
Page 98	Page 100
1 I, WANDA L. ANDREWS, have read the foregoing	1 financially interested in the action.
2 deposition and hereby affix my signature that same is true	2 I further certify that the amount of time used by
3 and correct, except as noted herein.	3 each counsel at the time of the deposition is as follows:
4 _____	4
5 _____	5 Mr. Hector F. Ruiz -(03:10:02)
6 WANDA L. ANDREWS	6 Attorney for PLAINTIFF UNITED STATES OF AMERICA
7	7 Ms. Deidra N. Sullivan -(00:04:42)
8 THE STATE OF _____)	8 Attorney for DEFENDANT CITY OF HOUSTON
9 COUNTY OF _____)	9 Mr. Keith Wyatt -(00:00:00)
10 Before me, _____, on this day	10 Attorney for PLAINTIFF UNITED STATES OF AMERICA
11 personally appeared WANDA L. ANDREWS, known to me (or	11 Mr. Dwain Gregory Capodice II -(00:31:09)
12 proved to me under oath or through	12 Attorney for PLAINTIFFS-INTERVENORS JANE DRAYCOTT
13 _____)(description of identity card or other	13 AND PAULA KEYES
14 document) to be the person whose name is subscribed to the	14
15 foregoing instrument and acknowledged to me that they	15
16 executed the same for the purposes and consideration	16
17 therein expressed.	17
18 Given under my hand and seal of office on this	18
19 _____ day of _____, 2019.	19
20	20
21	21
22 NOTARY PUBLIC IN AND FOR	22
23 THE STATE OF _____	23
24 My Commission expires: _____	24
25	25

<div>Exhibits</div> <div>Andrews Exh 013 3:17 29:6,7 37:24,25 38:1,3 39:7 48:19 58:12,16 59:19,22 62:7,15 64:17 78:5</div> <div>(</div> <div>(a) 60:24 61:3 62:3,11 63:3,10,14 65:16</div> <div>(b) 65:18</div> <div>(c) 30:10</div> <div>(d) 60:23 63:17</div> <div>(e) 60:24 64:19</div> <div>0</div> <div>010 38:16</div> <div>01:04:58 96:13</div> <div>09 38:16</div> <div>09-407 29:21,24 30:4 32:2,25 33:3 34:1,7,9,20 35:1</div> <div>09-407's 33:12,23</div> <div>09-424 18:25 19:3 21:7,12,24 32:6, 8,18,19,21</div> <div>09-424's 19:7 35:20</div> <div>1</div> <div>1 6:16 8:13 18:23,25 67:8,24 68:14, 21 71:6,9</div> <div>1(c) 8:16,20 9:10,18 18:20,22,24 19:5</div> <div>1(e) 8:18 9:3,10 32:2,4,6,7</div> <div>1-50 3:19 49:11 50:2,12 55:25 56:3, 9,14,22 57:13,22 82:5,7,13,17 87:21 88:23 92:5</div> <div>10 9:25</div> <div>10-311 35:11,14 36:14 37:2,6,8</div> <div>10:06:14 21:19</div> <div>10:11:09 21:19</div> <div>10:16:30 25:9</div> <div>10:20:34 25:9</div> <div>10:23:34 27:5</div>	<div>10:25:49 27:5</div> <div>10:34:50 31:12</div> <div>10:43:51 31:12</div> <div>10:55:14 36:19</div> <div>11 66:15,16,25 67:8,21 68:21 69:3,6, 7,8,11,16 70:1,9,10,15,17,21 71:5,17 72:3,14,21 74:1 95:11,13</div> <div>11:11:10 36:19</div> <div>12 10:1 33:15 68:11,12 72:4 73:6,8, 13,20,22 74:8,9,11,17,20 94:25 95:2, 9</div> <div>12-07-09 3:18</div> <div>12:03:48 65:7</div> <div>12:20:30 65:7</div> <div>12:46:23 83:4</div> <div>12:48:57 83:4</div> <div>13 1:17,20 3:17 29:6,7 37:24,25 38:1, 3 39:7 48:19 58:12,16 59:19,22 62:7, 15 64:17 78:5</div> <div>14 13:21 35:9,10 51:16 71:2</div> <div>14th 9:5</div> <div>15 10:13 13:17,21 35:17 40:7</div> <div>150 92:2</div> <div>16 10:14 36:24 37:1</div> <div>17 10:15,16</div> <div>18 37:11,14</div> <div>1801 4:20</div> <div>19 11:2,3 38:19 59:15</div> <div>1978 13:2</div> <div>1:04 1:21</div> <div>1st 71:5,16 73:12 74:2</div> <div>2</div> <div>2 7:2,22 8:5,10 18:22 19:4 20:18,19, 22,23 21:1 29:17,19 32:5,23,25 35:18 36:25 37:12 59:14 65:12</div> <div>2(c) 9:25 30:2 35:19</div> <div>2(e) 9:25 10:2,3 33:14,15</div> <div>20 11:4,11 65:11</div> <div>20- 56:7</div> <div>2000- 81:24</div> <div>2005 13:21 67:9,24 68:22 71:5,9,16, 20,23 74:2</div>	<div>2009-2010 76:13</div> <div>2010 23:9 28:7 38:16 39:14,15 43:11,21 46:14 48:19 56:10 71:23 72:1 86:5</div> <div>2012 72:1,4 81:25 85:1 91:22</div> <div>2013 51:16 56:19,23 71:2 72:8,16 82:2 91:23</div> <div>2013-'14 51:3</div> <div>2015 72:4</div> <div>2018 52:21,24,25 68:14 71:6 73:12 95:22</div> <div>2019 1:17,21 6:20 9:5</div> <div>202.514.1005 2:7</div> <div>20530-0001 2:6</div> <div>21 8:10,19,20 9:2,25 10:1,13,14,15 11:2,3,4 18:23,24 19:4 29:20 32:5 33:15 35:9,10 37:14 59:15 65:11</div> <div>2300 2:11</div> <div>2318 3:19 37:16 38:24 59:19</div> <div>2826 65:16</div> <div>29 3:17</div> <div>2nd 6:20</div> <div>3</div> <div>3 19:12 35:8,10 36:22</div> <div>3(c) 10:10,13</div> <div>3(e) 10:11,14 36:23 37:1</div> <div>30 40:7</div> <div>30(b)(6) 3:15 6:18 7:5 29:6 57:2</div> <div>300 2:23</div> <div>4</div> <div>4 3:5 8:10 18:23 19:4,21 37:11,14 38:7</div> <div>4(d) 11:1,2 38:18,22</div> <div>4(f) 11:2 59:14,17</div> <div>407's 33:22</div> <div>407947 1:25</div> <div>4:18-CV-00644 1:4</div>
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